

Impact of Modernization on the E-rate Competitive Bidding Process: Funding Years 2017 to 2021

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March 30, 2022

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Executive Summary

The E-rate program was launched in 1997 and modernized in 2014. It supports 95.4% of all K-12 students in the United States by providing discounted internet access and Wi-Fi equipment to schools and public libraries. To receive support, applicants must follow specific procedures established by the Federal Communications Commission (FCC) and use an online portal called EPC. Applicants use the EPC system to notify vendors of Requests for Proposals (RFPs), report the results of their local competitive bidding process, and submit funding requests to USAC, the E-rate program administrator. The purpose of this white paper is to provide data and applicant feedback about the performance of the current system.

Data transparency was emphasized when the FCC updated the E-rate program in 2014. The FCC required that winning bid information be made public, including names of winning vendors, unit pricing, quantities, model numbers, and other details about the goods and services being delivered with support from the E-rate program. The FCC's stated intent was to increase competition and drive down prices. Analyzing the publicly available bidding information, we can now see the results. The level of competition has increased significantly while the price of goods and services has dropped dramatically. From 2017 to 2021:

- E-rate applicants collectively received 419,972 bids and awarded 144,625 contracts.
- The number of proposals received per contract increased 26% from 2.57 to 3.23.
- The percentage of contracts awarded based on less than two bids dropped from 41% to 25%.
- The median price per megabit paid by K-12 schools dropped 71% from \$4.80 to \$1.39.
- The average price per wireless access point dropped 49% from \$1,414 to \$716 per unit.
- The portion of requests tied to non-negotiated contracts dropped to a record low of 3%.

This data is supported by the sentiments of E-rate applicants: 90.9% agree the E-rate is ensuring access to affordable broadband and 68.1% agree the current E-rate competitive bidding process lowers their prices.

In 2014, the FCC considered requiring the publication of non-winning bids in EPC but determined that it would be more trouble than it was worth. Instead, applicants were required to maintain copies of their losing bids for ten years and provide them to USAC when requested. This ensures that all information necessary to document compliance with program rules is available. Now, in 2022, the FCC is considering reversing course and requiring non-winning bids be submitted to USAC and published in EPC. Furthermore, the FCC is considering expanding the role of USAC to include controlling the E-rate bidding process. Under the proposed federalized system, USAC would receive and store all bids in EPC, determining who has access to the bids and when they can be viewed.

Trusting USAC to receive and manage 83,994 proposals each year using the EPC system, runs contrary to most applicants' views. The majority do not have a favorable impression of EPC. USAC has spent millions of dollars and seven years trying to improve the system that applicants still find lacking in many regards. These shortcomings include documented problems with the Form 470 RFP notification system -- problems the FCC has yet to adequately address, despite seven years of development.

It is difficult to understand what the FCC hopes to gain with its proposed changes. The current program is increasing competition and driving down prices, while still leveraging existing state and local competitive bidding rules. E-rate dollars are subject to robust public accountability via online published data, and, when necessary, USAC can require applicants to provide additional documentation or forfeit their funding.

Background

Launched in 1997, the Schools and Libraries Universal Service Support Mechanism, commonly referred to as the E-rate program, provides discounts up to 90% on the purchase of internet access and Wi-Fi networks for K-12 schools and public libraries in the United States. \$4 billion is available annually, and it currently supports 95.4% of K-12 students¹. The program is regulated by the Federal Communications Commission (FCC) and managed by the Universal Service Administrative Company (USAC).

Qualified applicants follow specified procedures for awarding contracts, applying for funding, submitting payment paperwork, and maintaining records. To qualify for discounts, the E-rate program requires that all goods and services be competitively bid. Applicants must follow their state and local competitive bidding rules, post an FCC Form 470 to notify vendors of the opportunity, wait at least 28 days to award contracts, and use the cost of E-rate eligible items as the primary factor in making purchasing decisions.

E-rate Modernization

In 2014, the FCC passed sweeping reforms to modernize the E-rate program, with three desired goals²:

- (1) ensuring affordable access to highspeed broadband sufficient to support digital learning in schools and robust connectivity for all libraries.
- (2) maximizing the cost-effectiveness of spending for E-rate supported purchases.
- (3) making the E-Rate application process and other E-rate processes fast, simple, and efficient.

A key strategy in achieving these goals was to provide the public with enhanced access to E-rate funding request information. To implement this strategy, the FCC instructed USAC to build a new online system called the E-rate Productivity Center (EPC). Launched in 2015, the system initially performed quite poorly. Applicants struggled to use the EPC system because of numerous design errors and software bugs. Over the course of two years, significant improvements were made to the EPC system. Applicants can work with the system, but problems remain, particularly with the Form 470 bid request system. Most recently, in 2020, the FCC postponed fixes to the EPC Form 470 system until 2022, seven years after the launch of EPC. Appendix A of this report provides a detailed history of the on-going saga surrounding EPC.

Current Process

The EPC system requires that applicants submit and make public the results of the E-rate competitive bidding process. Information for winning bids is published online. The published information includes:

- Name of winning vendor and contract terms
- Number of bids received
- Make, model and description of goods and services being delivered
- Unit prices, quantities being purchased, and total projects costs

This information is entered in EPC for every contract and then published online for public scrutiny.

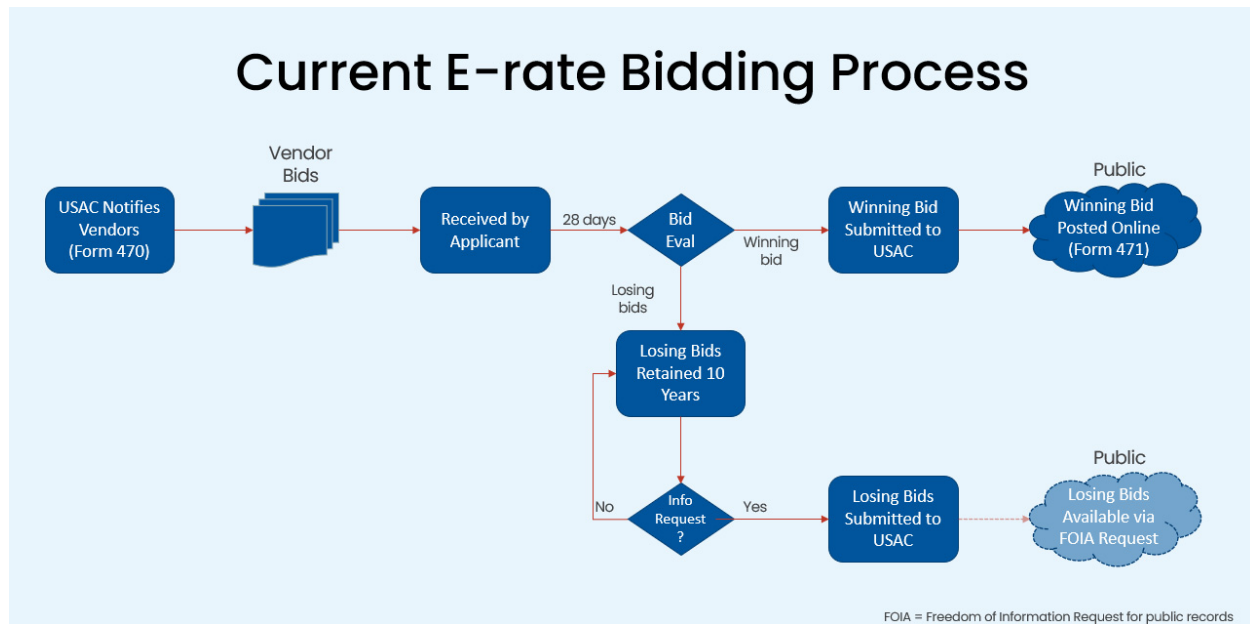
¹ "E-rate Supports 95% of K-12 Students", December 2020, <https://www.fundsforlearning.com/news/2020/12/e-rate-supports-95-of-k-12-students/>

² E-rate Modernization Order, July 11, 2014, ¶15, <https://ecfsapi.fcc.gov/file/7521732717.pdf>

The current E-rate bidding process can be summarized as follows:

- Applicants use the USAC system to notify vendors of bidding opportunities
- Applicants receive and evaluate bids, and award a contract after a 28-day waiting period
- Applicants notify USAC of the winning bidder and provide all cost information
- The public receives the winning bid information online
- If requested, applicants provide copies of losing bids and evaluation materials to USAC

The diagram below illustrates this process.



When the EPC system was first imagined in 2014, the FCC considered requiring that applicants publicize non-winning bids, too. Ultimately, the FCC determined that it was not in the public interest to create this additional burden for applicants:

Therefore, we are persuaded that the current burden to applicants of submitting comprehensive bid information to USAC outweighs any incremental benefit to the public from the publication of prices for non-winning bids, which, by definition, were not the most cost-effective choice³.

The FCC determined that publishing data for the losing bids was, in effect, more trouble than it was worth.

Proposed New System

In December 2021, the FCC announced plans⁴ to fundamentally change the E-rate competitive bidding framework. More than just publishing non-winning bids, the new proposal went much farther. Under the proposed framework, the FCC would take away management of the bidding process from local decision

³ Ibid., ¶165

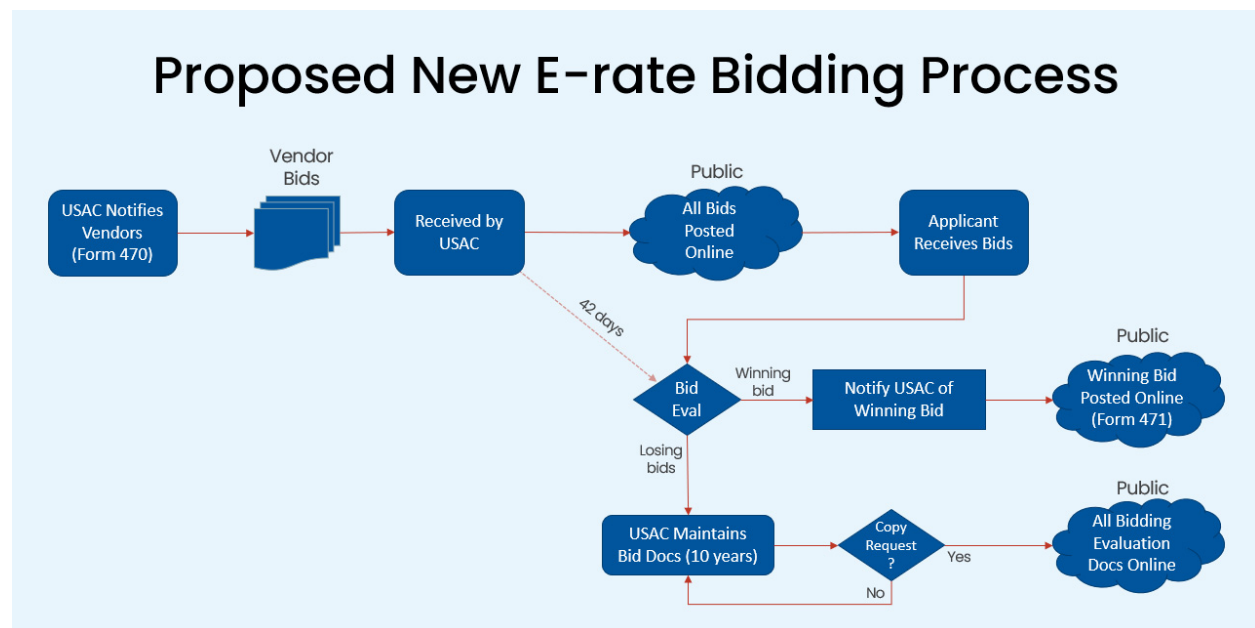
⁴ Notice of Proposed Rulemaking, Promoting Fair and Open Competitive Bidding in the E-rate Program, December 14, 2021, <https://ecfsapi.fcc.gov/file/121669468706/FCC-21-124A1.pdf>

makers and require that USAC receive and hold bids on behalf of applicants. The FCC is seeking public comments on this change no later than May 27, 2022⁵.

The proposed E-rate bidding process can be summarized as follows:

- Applicants use the USAC system to notify vendors of bidding opportunities
- USAC receives and publishes all bids for the applicant and public to view
- Applicants evaluate and award a contract after a 42-day waiting period
- Applicants notify USAC of the winning bidder and provide all final cost information
- The public receives the winning bid information online
- USAC maintains all bids and evaluation documentation in EPC for a 10-year period

The diagram below illustrates the proposed process.



Purpose of Analysis

The intent of this white paper is to provide the FCC and other stakeholders with current statistics and analysis regarding the performance of the existing E-rate competitive bidding system. It is important that regulatory decisions be based on accurate and up-to-date information, not perceptions, or anecdotal evidence that may pre-date the current, modernized E-rate program.

The remainder of this report is divided into three sections. The first two sections present empirical data and analysis of trends in the E-rate competitive bidding landscape, focusing on competition and pricing. The third section provides survey data about the opinions of applicants regarding the E-rate competitive bidding process. Two appendices are also provided. These include more information about EPC, both the history of the system (Appendix A) and individual applicant opinions of the system (Appendix B).

⁵ Order Granting Extension of Time, March 16, 2022, <https://ecfsapi.fcc.gov/file/0316021083011/DA-22-284A1.pdf>

Trends in Competition: 2017 to 2021

When the E-rate program was modernized, the FCC emphasized data transparency in order “to increase competition and drive down prices.”⁶ This section of the report focuses on competition, including the number of contracts awarded annually, the number of RFPs released, and the count of proposals prepared by vendors. The next section will look at trends in pricing.

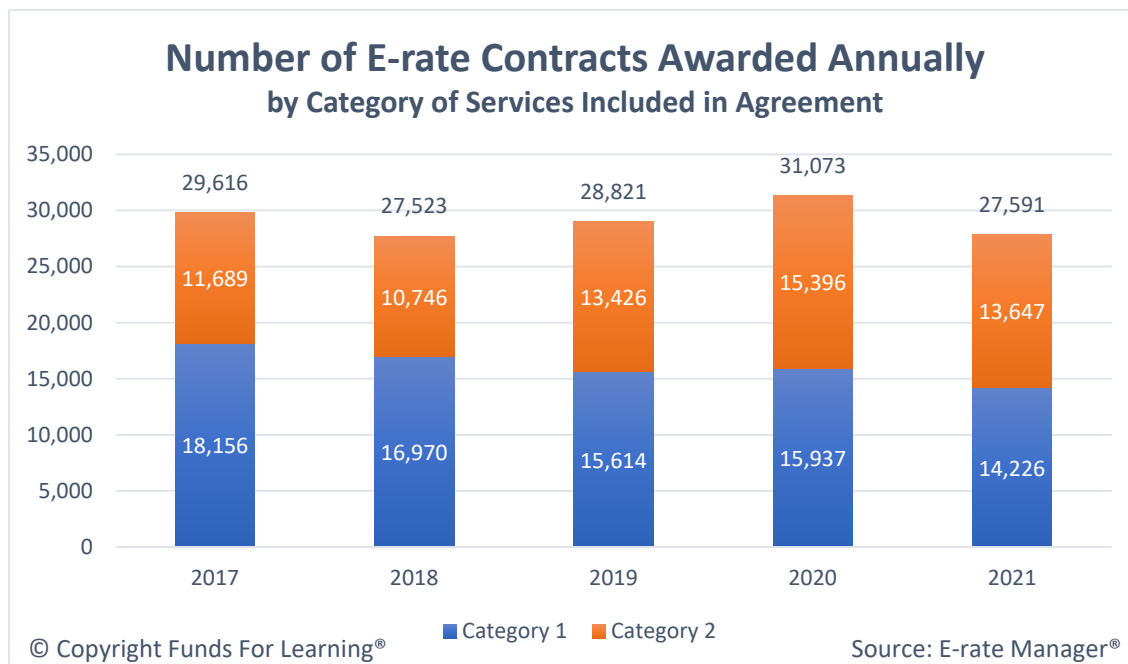
Methodology

The competitive bidding data reviewed are for funding years 2017 to 2021⁷. These are the past five years for which a complete dataset of competitive bidding and funding request data is available⁸.

For purposes of this analysis, a contract is defined as a purchasing decision. It could be a multi-year agreement, single-year agreement, a tariff-rate service, or month-to-month service agreement. Contracts were identified by matching applicants with the following data: Applicant Billed Entity Number, Form 470 application number, contract number, contract award date, contract end date, and vendor name.

Contracts

In the past five years, there have been 144,625 contracts awarded by E-rate participants, an average of 28,925 new contracts per year. The chart below illustrates the number of contracts awarded annually based on the category of services included in the agreement⁹.



⁶ E-rate Modernization Order, July 11, 2014, ¶162, <https://ecfsapi.fcc.gov/file/7521732717.pdf>

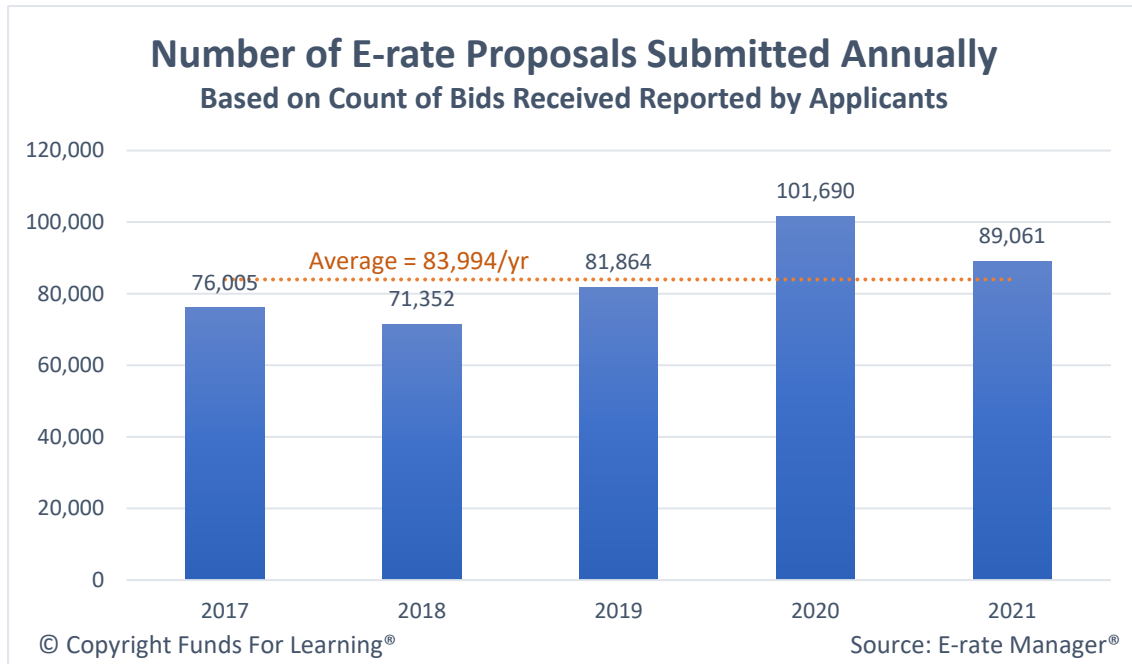
⁷ Voice services were phased out of the E-rate program beginning in funding year 2015, and the bidding and contract information for telephone and cellular voice services has been excluded from this report.

⁸ The E-rate funding year 2022 application review cycle is still underway as of this report’s publication date.

⁹ The total number of contracts is slightly less than the sum of the two categories because some service agreements include both.

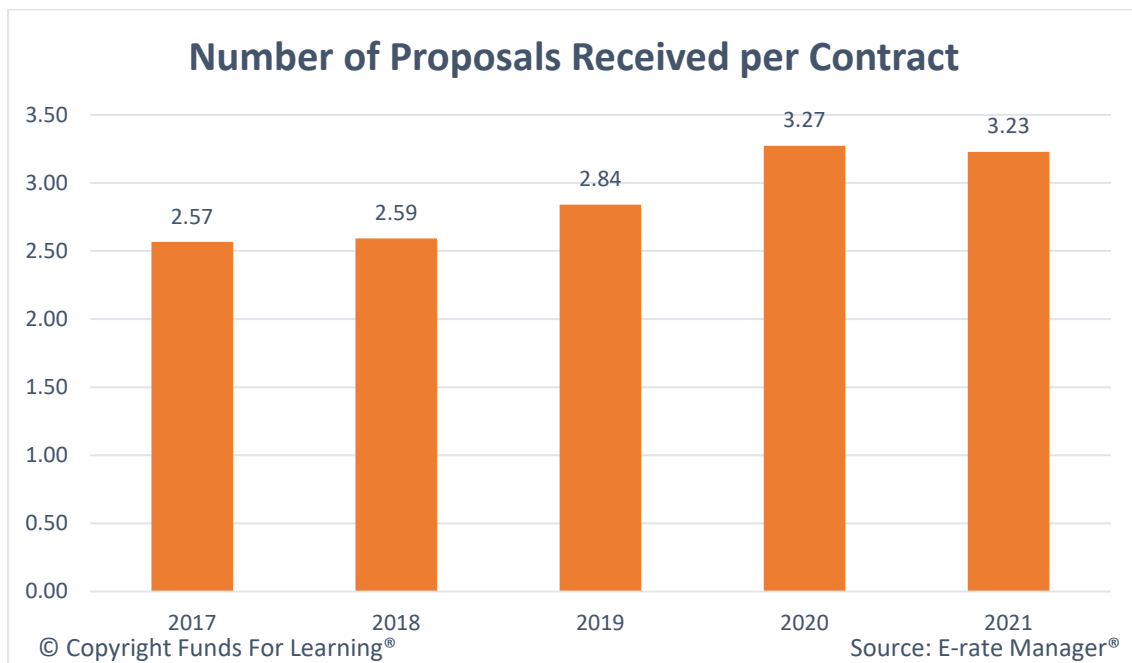
RFPs and Proposals

In the past five years, there have been 419,972 proposals submitted for E-rate funded projects and services. This is an average of 83,994 bids per year.



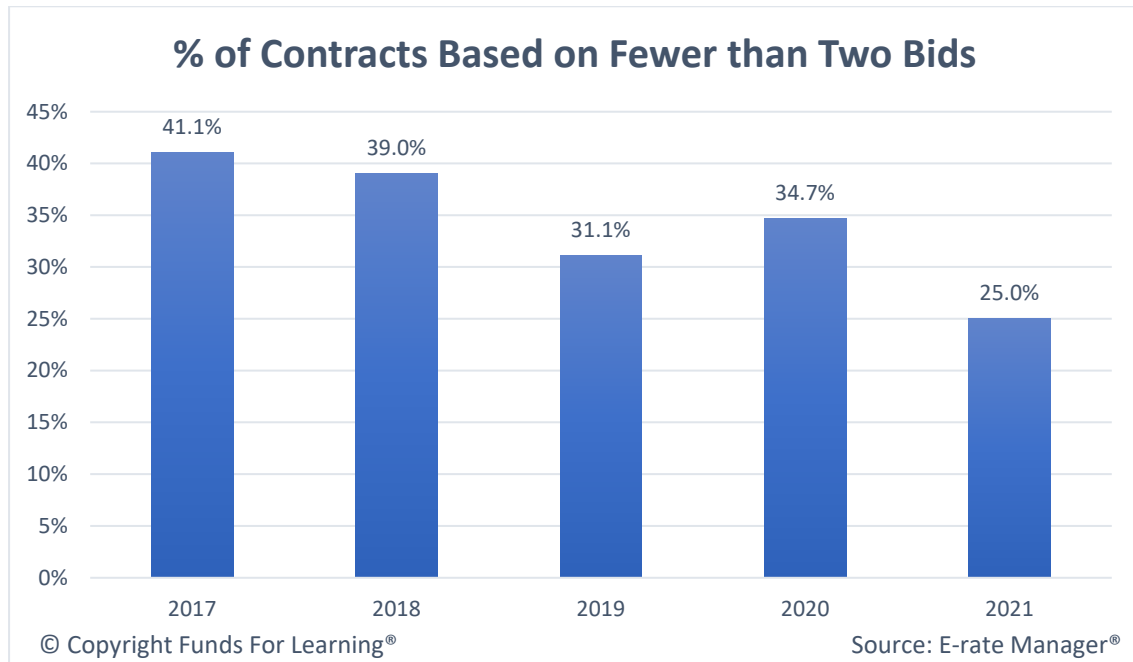
Proposals per Contract

A key indicator of competition is the count of proposals received. Generally, the more proposals received, the healthier the competition, particularly if there are three or more bids received. Over the past five years, the average count of proposals received has increased 26% from 2.57 to 3.23.



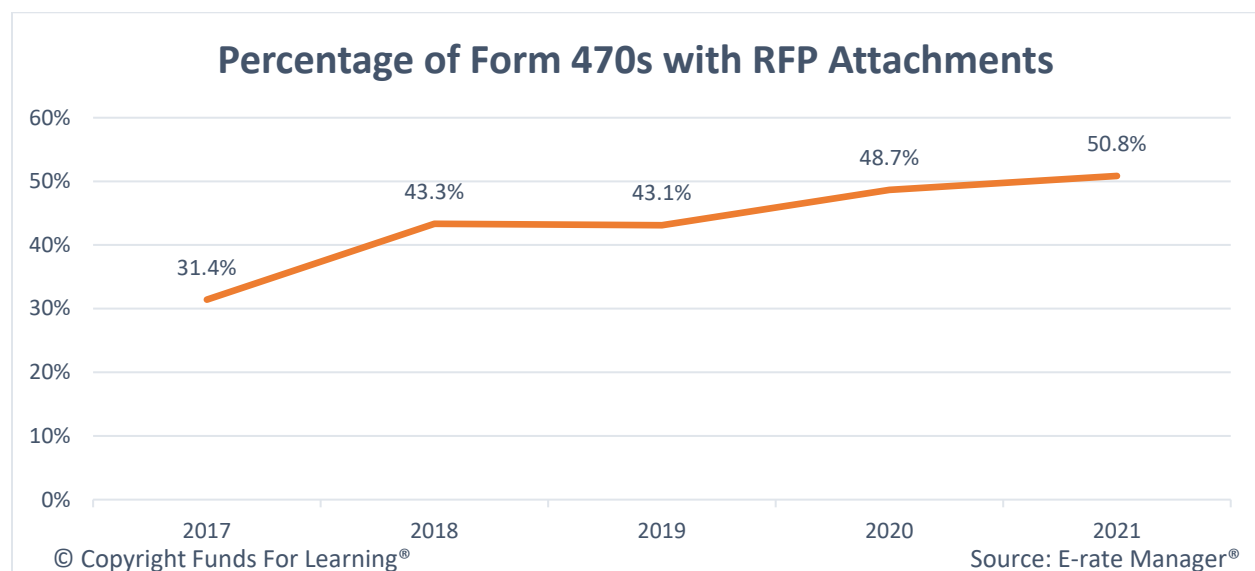
Single-Bid Contracts

An important threshold for competition is the receipt of at least two bids. Therefore, another significant indicator of trends in competition is the change over time in the percentage of contracts awarded based on fewer than two bids. From FY2017 to FY2021, the percentage of contracts awarded based on one or no bids has dropped from 41% to 25%.



Detailed Requests for Proposals

The more detail that an applicant can provide a potential vendor, the more likely the vendor will be able to create an accurate price quote without the need to “guestimate”. This usually results in proposals for more cost-effective solutions. Since 2017, the number of Form 470 notifications with RFP attachments has increased from 31.4% to 50.8%.

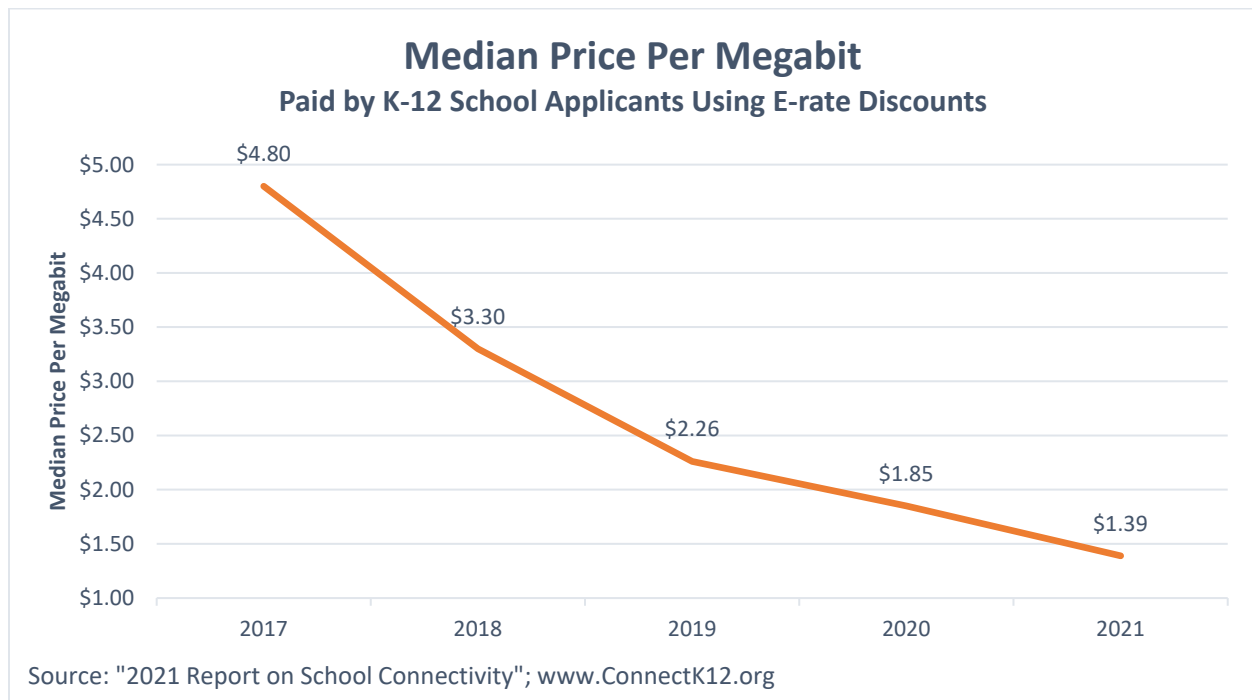


Trends in Pricing: 2017 to 2021

The FCC's second stated goal for data transparency was a decrease in pricing. Since the publication of the winning bid data began after Modernization, there has been a significant decline in pricing. This is directly evident in the data submitted by applicants. It is also inferred by changes in the types of contracts being submitted on funding applications.

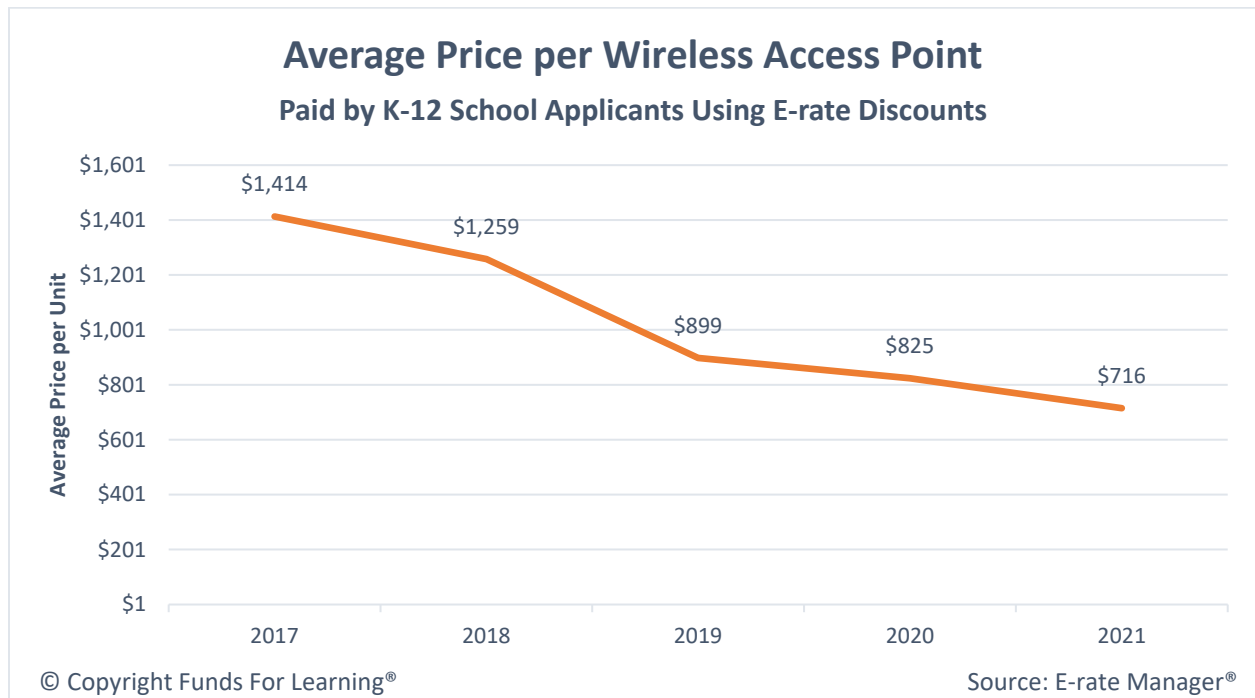
Price per Megabit

As documented by EducationSuperHighway and the continuing work of the ConnectK12 initiative, the median price per megabit for internet access paid by schools has dropped 71% over the past five years. In 2017, the median price was \$4.80 per megabit. In 2021, the median price was \$1.39 per megabit.



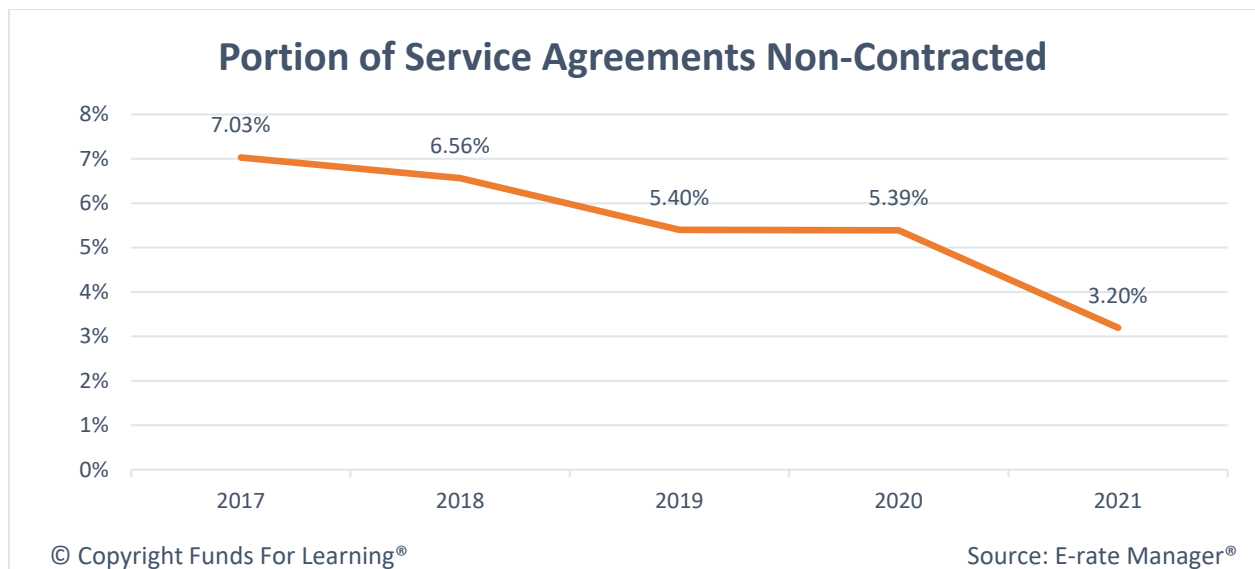
Price per Wireless Access Point

According to Form 471 E-rate application data, the average price of wireless access points paid by schools and libraries has dropped 49% over the past five years. Wireless access points are used to deliver Wi-Fi signals on school and library campuses, and they are the last link in the chain of goods and services necessary to connect students and library patrons to the internet. In 2017, the average price listed for a wireless access point was \$1,414 per unit. By 2021, the average had dropped to \$716 per unit.



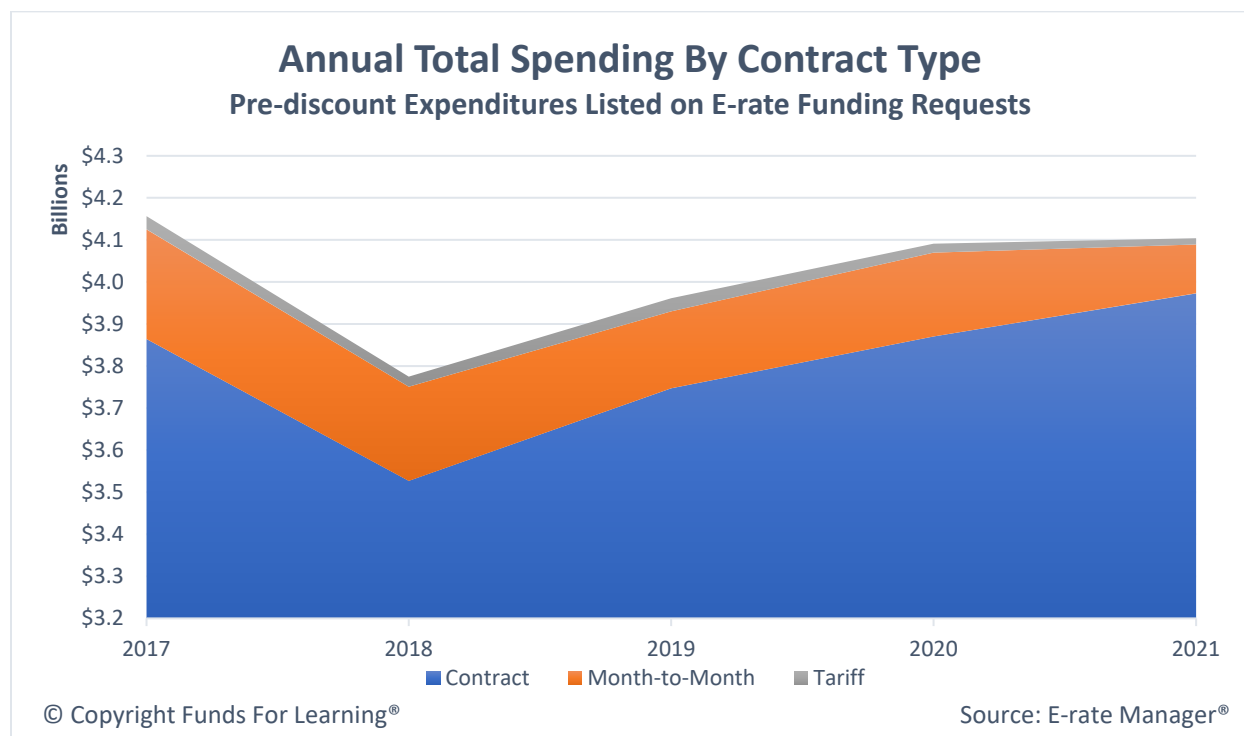
Contract Types

Another indicator of lower prices is the proportion of E-rate projects based on negotiated contracts versus non-contracted arrangements. There has been a 50% decline in the use of tariff-based or month-to-month agreements in the past five years. The E-rate regulations allow applicants to purchase goods and services using tariff or month-to-month purchasing agreements, subject to state and local competitive bidding rules. While permissible, these expenditures are generally considered more expensive. The lack of a price negotiation and/or a discount for a longer-term commitment, typically results in a higher per unit cost.



As the percentage of non-contracted agreements has decreased, the percentage of E-rate dollars requested based on contracts has increased. In 2017, 93% of funding requests were based on contracts. In 2021, 97% of requests were based on contracts. The current competitive bidding framework has led to the lowest percentage of purchases tied to tariff or month-to-month agreements in the history of the E-rate program.

Contract Type	Annual Total Pre-Discount E-rate Expenditures by Funding Year				
	2017	2018	2019	2020	2021
Contract	\$3,864,343,797	\$3,526,939,433	\$3,747,157,194	\$3,870,316,694	\$3,972,761,920
Month-to-Month	\$260,706,563	\$223,964,464	\$182,981,334	\$199,313,373	\$116,340,942
Tariff	\$31,571,967	\$23,793,130	\$30,978,112	\$21,152,328	\$14,864,541
Total	\$4,156,622,327	\$3,774,697,027	\$3,961,116,640	\$4,090,782,395	\$4,103,967,403



Applicant Opinion

A survey of applicants is conducted annually with the support of the E-rate community, and the results are submitted to the FCC. In 2021, a record 2,164 applicants participated in the survey. The responses include information about applicants' views on the efficacy of the current E-rate competitive bidding process and feedback on the usability of the EPC system.

Significance of the Current E-rate Process

A strong majority of survey respondents expressed the importance of the E-rate program in cost-effectively fulfilling their organization's internet connectivity needs:

- 96.7% agree they connect more students and library patrons to the internet because of E-rate¹⁰
- 94.5% agree E-rate funding is vital to their organization's internet connectivity¹¹
- 90.9% agree the E-rate is ensuring access to affordable broadband¹²
- 85.1% agree the E-rate is maximizing the cost-effectiveness of service¹³
- 68.1% agree the current E-rate competitive bidding process lowers their prices¹⁴

According to applicants, the E-rate program is a vital source of funding that is connecting more students and library patrons to the internet with affordable, cost-effective service, and this is all supported by the current E-rate competitive bidding process.

Negative Views of EPC

EPC's current role in the competitive bidding process is to notify vendors of opportunities, via the Form 470, and then to receive and publish the winning bid information. EPC does not currently play any role in managing the procurement process.

Even without managing the competitive bidding process, the current EPC system receives poor marks. Despite the investment of millions of dollars and years of development time¹⁵, most applicants do not find the EPC system helpful or easy to use. Here are a few comments from the 2021 applicant survey that represent the concerns held by many applicants regarding EPC.

- "The complicated online portals are driving potential E-rate applicants away..."
- "The EPC site is NOT intuitive. In fact, it is a nasty, cranky beast."
- "EPC is terrible to use. It is not intuitive at all."
- "EPC is the bane of my E-rate experience."
- "EPC is horrible."

All the EPC-related comments from the 2021 survey are included in Appendix B of this report.

¹⁰ "2021 E-rate Trends Report", November 2021, p.25,
<https://ecfsapi.fcc.gov/file/11031633917330/2021-11-03-E-rateTrendsReport-ExParte.pdf>

¹¹ Ibid., p.25

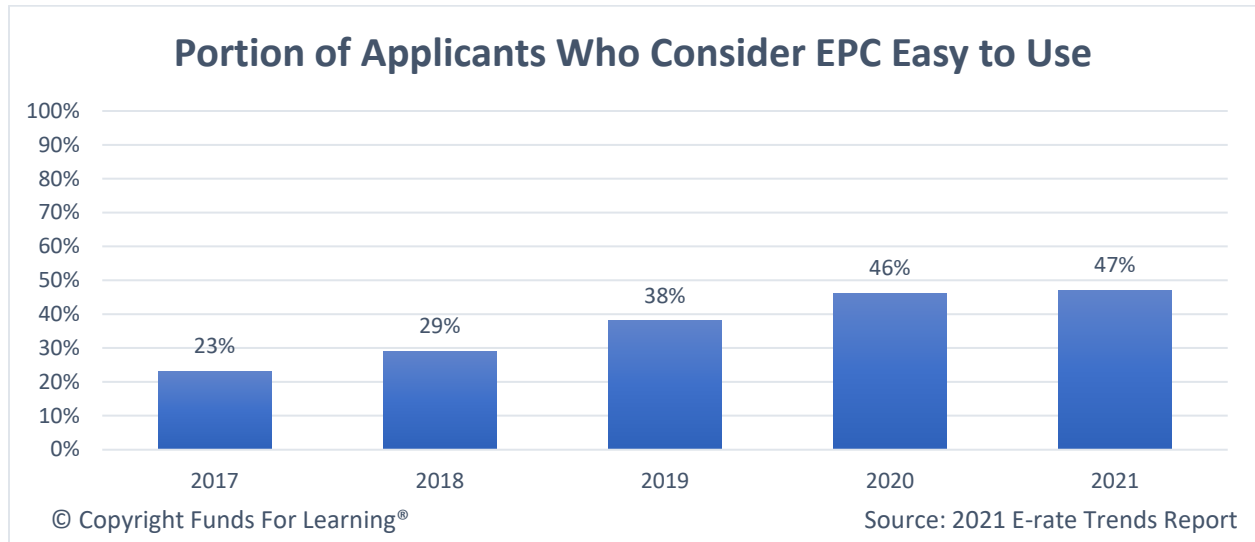
¹² Ibid., p. 22

¹³ Ibid., p. 22

¹⁴ Ibid., p.25

¹⁵ See <https://www.fundsforlearning.com/news/2017/04/usac-told-to-fix-flaws-focus-on-service/>

It should be noted that there have been improvements to EPC in the past five years. The chart below illustrates the number of applicants who find EPC easy to use. That number doubled from 23% in 2017 to 46% in 2020; however, improvements to the system's ease of use seem to have peaked, and as of 2021, only 47% of applicants consider EPC easy to use. 53% do not consider it easy to use.



Concluding Thoughts and Questions

The existing E-rate competitive bidding system is functioning well. There is robust demand from applicants. Competition is increasing and prices are decreasing. Local officials manage procurement in conjunction with existing state and local competitive bidding requirements. Applicants and vendors are familiar with the functioning of the current system. Public accountability is provided via online pricing data; and, because of document retention requirements, USAC can provide more scrutiny and request additional information where needed.

By contrast, the FCC's proposal to federalize E-rate bidding is fraught with unknowns. How effectively could USAC manage a competitive bidding system that encompasses more than 20,000 different jurisdictions? How can the EPC system that is already difficult to use be improved to manage 83,994 bids each year? What gives the FCC confidence that USAC can manage the bidding process more effectively than local officials? How will USAC be held accountable for errors or mistakes in the bidding process? Will USAC certify that it will maintain documentation for the required ten-year period?

It is difficult to understand what, if anything, the public can gain from the FCC's proposed changes. Increased complexity and further reliance on the EPC system is unlikely to enhance competition or improve local purchasing decisions.

As the old saying goes, "if it ain't broke, don't fix it."

Appendix A: E-rate Modernization and EPC

Introduction

If EPC is to manage the E-rate competitive bidding process for every K-12 school and public library in America, it is important to understand the history of the system, how it interacts with regulations and impacts applicants. To assess the current E-rate bidding framework, one must consider the entire system, including the web-based tools and support offered to applicants and vendors. The E-rate program's competitive bidding framework consists of regulations and EPC. Applicants follow FCC rules about form submissions, bid evaluations, allowable contract award dates, the receipt of gifts from vendors, and so on. At the same time, the EPC system promotes competition by notifying vendors of bidding opportunities via the Form 470, and publishing the names of winning bidders, the prices of goods and services sold, etc.

The E-rate competitive bidding process is composed by the interplay of these rules and systems. In the E-rate Modernization Order, the FCC acknowledged the interaction between rules and operations, and the importance of balancing the two:

Commenters overwhelmingly agree that making E-rate process fast, simple, and efficient is critical to the overall success of E-rate. Commenters specifically highlight, among other things, the importance of simplicity and transparency in the application submission and review process, and the need for timeliness in making funding commitments and paying invoices, reclaiming unused funds, and completion of the application and selective review processes. We recognize that there are a number of considerations that compete with our efforts to simplify the program for applicants, speed processing of applications and appeals, and minimize overhead costs. For example, we will need to appropriately balance our need for data to appropriately monitor program performance, with our efforts to minimize the application burden on applicants.¹⁶

The FCC also highlighted the importance of simplifying rules and processes to encourage participation in the program. A program with zero participants may lack any risk of waste, fraud, or abuse, but it would certainly not be judged a success.

Simplification of the E-rate application process also eases the administrative burden on applicants—which is particularly important for smaller schools and libraries that lack extensive administrative support. Conversely, complexity and delay discourage participation and ultimately result in fewer schools and libraries fully investing in needed high-speed broadband connections.¹⁷

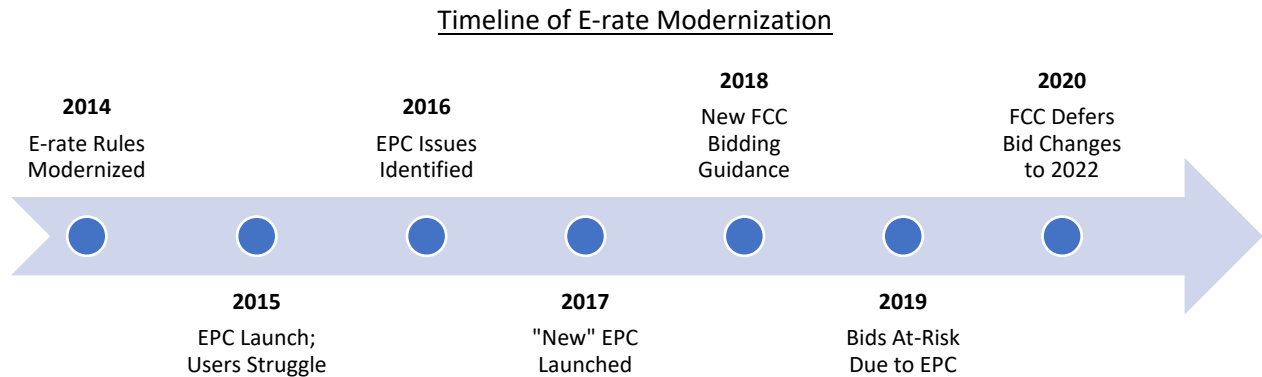
Ultimately, a successful federal program requires good regulations and good systems that are properly balanced and not overly complex. Therefore, to comprehend the effectiveness of the E-rate competitive bidding landscape, it is necessary to consider the interplay of the E-rate program's regulations and systems. To understand where the program stands today, and properly consider improvements, it is necessary to study the context of what has led to the current situation. The purpose of this appendix is to provide some of that context by exploring the evolution of the EPC system from 2015 to present.

¹⁶ E-rate Modernization Order, July 11, 2014, ¶56, <https://ecfsapi.fcc.gov/file/7521732717.pdf>

¹⁷ Ibid., ¶55

E-rate Modernization from 2015 to 2022

In 2015, the FCC and USAC launched the E-rate Productivity Center (EPC). The initial system was fraught with bugs and a poorly designed user interface. For two years, USAC worked to improve the system, and, in 2017, a significantly improved version of EPC was released. However, the system still had shortcomings, and in 2018, the FCC released new bidding guidance to address the challenges applicants faced when posting bid requests in the online FCC Form 470 system. However, applicants and vendors continued to struggle with the system. Despite requests for fixes to the bidding request system, in 2020 the FCC defer improvements to the Form 470 bid request system until 2022. As of the publication date of this paper, nearly seven years after the launch of EPC, the FCC has yet to address the user-identified inadequacies in the bid request system. The diagram below illustrates the timeline of events.



Funds For Learning has chronicled this saga on its website. The remainder of this appendix is comprised of relevant news articles documenting this seven-year journey.

Year	Funds For Learning News Article Title (and Date)
2014	<ul style="list-style-type: none"> The Next Step for a Modern E-rate Program (Nov. 17)
2015	<ul style="list-style-type: none"> USAC Working to Improve EPC (Oct 30)
2016	<ul style="list-style-type: none"> EPC "Known Issues" and Other Tips (Dec 9)
2017	<ul style="list-style-type: none"> USAC Told to Fix Flaws, Focus on Service (Apr 19) Throwing Good Money After Bad (Apr 21) The Elephant in the Room (Apr 28) USAC Announces EPC Changes (Oct 3)
2018	<ul style="list-style-type: none"> FCC Address Bidding Rules Concerns (May 3)
2019	<ul style="list-style-type: none"> 698 Applicants At-Risk Due to Form Design (May 7) FCC Seeks Comment on Bidding Forms (Oct 1) FCC Eases FY2019 Bidding Requirements
2020	<ul style="list-style-type: none"> FCC Defers Form 470 Changes Until 2022

by **Peter Kaplan**

November 17, 2014



The Next Step for a Modern E-rate Program

FCC Chairman Tom Wheeler [has proposed a significant increase](#) to the E-rate fund, the first such change since the program was established in 1997. For many years, Funds For Learning has championed, most recently in our [E-rate 2.0](#) proposal, the urgent need to modernize and increase E-rate funding in order to continue to promote broadband connectivity.

In a [letter to the FCC](#), Funds For Learning CEO, John Harrington, notes that, "The E-rate program has been widely successful in helping schools and libraries connect to the Internet. An increase in the fund will further enable applicants to enhance their network capacity, putting E-rate services to good use in the hands of students and library patrons."

Adding more financial support is the ideal next step to accompany the FCC's recent [E-rate Modernization Order](#). That Order focused the E-rate more narrowly on broadband connectivity, while improving the application process and providing additional transparency of funding requests; putting more money into the E-rate program will be the necessary fuel to make all of those changes successful.

The [demand for E-rate support](#) has been consistently increasing over time, and now the FCC has an opportunity to address that demand while promoting the continued success of the program. The direct implication of more money for applicants is that more students and library patrons will have access to robust high-speed Internet access. Even more, the proposed change will enable applicants to quickly, effectively and confidently improve their on-campus network capacity with the help of E-rate support. This will benefit every member of the community.

With Chairman Wheeler's proposed fund increase, the FCC has the opportunity to complete the modernization of the E-rate program, and we encourage them to take it.

On **Thursday, December 11th, 2014 at 3:00 p.m. ET**, John Harrington, Chief Executive Officer, Funds For Learning, will host a webinar for E-rate applicants entitled: ***E-rate 2.1 – The Next Step for E-rate Modernization***, covering the impact of the FCC's vote on increasing the fund. Please click [here](#) for registration information.

For more about Funds For Learning's commentary on E-rate Modernization and the need for increased funding, see the articles below:

- [Getting Where We're Going](#)
- [Coalition of E-rate Stakeholders Calls for Increase in Funding](#)
- [FFL Submits Comments on FNPRM and Draft ESL](#)
- [FFL Response to E-rate Reform](#)
- [High Stakes Require Action](#)
- [FY 2014 Priority One Demand Analysis](#)
- [FFL Ex Parte Meeting with FCC \(10-21-2013\) \(PDF\)](#)
- [Funds For Learning Files Ex Parte Notice to FCC](#)
 - [View the Presentation \(PDF\)](#)
- [Funds For Learning's Comments to the FCC \(PDF\)](#)
- [FFL Submits FY 2013 Demand Analysis to the FCC](#)
- [E-rate 2.0: A Framework for Change](#)
- [FFL's April 3, 2013 Exparte Meeting with FCC Staff \(PDF\)](#)
 - [View the Presentation \(PDF\)](#)
- [FFL Presents the FFL E-rate 2.0 Proposal to the FCC](#)

<https://www.fundsforlearning.com/news/2014/11/the-next-step-for-a-modern-e-rate-program/>

by John Harrington
October 30, 2015



USAC Working to Improve EPC

The count of active users in the new USAC EPC system remains low, despite the fact that all E-rate program participants must register. Funds For Learning® estimates that approximately 66% of potential users have created their mandatory account since the new system came online this past July.

EPC User Account Analysis
(as of October 30, 2015)

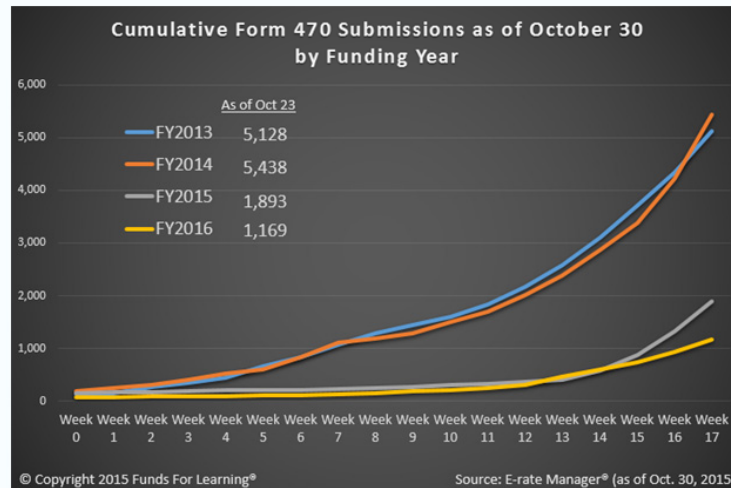
User Type	Current Count	Est. Final	Est. %
Applicant	17,455	27,155	64%
Service provider	3,709	5,459	68%
Consultant*	800	800	100%
Total	21,964	33,414	66%

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Source: EPC and E-rate Manager® (as of Oct. 30, 2015)

* Consultant estimate provided by USAC

The slow rate of activation means that many applicants can not submit the mandatory competitive bidding documents (e.g. the FCC Form 470). This may explain, in part, the historically slow pace of Form 470 submissions. As of today, October 30, 2015, only 1,169 Forms 470s have been posted.



At its quarterly meeting, the USAC Schools and Libraries Committee discussed the many challenges associated with the EPC system and discussed three initiatives to improve its performance. The Committee heard about a new USAC outreach effort to promote user enrollments. The Committee also discussed and approved a “sizable” investment in the EPC system’s underlying software to enhance and augment its existing functionality. Finally, the Committee also received a report regarding USAC’s new approach to software development, involving end-user’s in testing and design of the new Form 471 funding application.

This week, USAC also chipped away at a list of commonly requested user features by rolling out a package of minor enhancements to EPC, including:

- Allowable contract dates are now displayed in posted Form 470s
- Full and partial-rights users can now perform additional functions related to school enrollment and other site attributes.
- State coordinators now have “view-only” rights to all public schools and libraries in their states.

<https://www.fundsforlearning.com/news/2015/10/usac-working-to-improve-epc/>

by Verlyne Jolley
December 9, 2016



EPC “Known Issues” and Other Tips

E-rate applicants preparing for 2017 should prepare for another bumpy ride using the E-rate Portal, EPC. Current users know that struggles with the system have not abated and, in some ways, have only gotten worse during the application review process (PIA). USAC's attempts at streamlining the E-rate have actually slowed things down and made it harder. Case in point, USAC now is using two systems to process forms from multiple funding years: the new (and under development) EPC system, and the Legacy system, “old Bessie”, for payments and submissions prior to FY2016. It's no wonder that the pace of E-rate funding commitments is at an [historically low level](#).

To navigate this complex mess, E-rate applicants need to be well-informed and prepared for the challenges that lie ahead. Here are a few important tips that can help:

- Applicant users are reporting 486 “disappearing FRN” issues as they try to submit the Form 486 for FY2016 in the EPC system. To verify if EPC may have eaten your Form 486, it is best to recheck any Form 486 that may not be processed quickly. If pending for more than 24 hours, there is a good chance your form lost its FRNs. Applicants should delete the Form 486 with the disappearing FRNs and resubmit.
- Many applicants have applications with a “Wave Ready” status, but, due to an unresolved EPC system error, USAC has been unable to issue funding commitment letters. Applicants with pending FY2016 applications and/or who have not received any Program Integrity Assurance (PIA) questions may need to request these projects again for FY2017.
- Applicants should be aware that PIA for FY2016 is in EPC and is not received via email as in prior years. PIA in EPC requires applicants to answer questions, upload documents and respond to Item 21 line item changes in USAC generated spreadsheets by site location. Once an applicant answers and submits a PIA response in EPC that PIA Question and Answer is available, but difficult to find. Applicants are advised to maintain copies of any PIA questions and responses.
- Applicants submitting Form 470 applications along with RFPs should also be aware that currently EPC has difficulty allowing users to upload any RFP addendums. USAC has not provided guidance regarding any alternative options other than to try and try again. Eventually, after multiple attempts, you may get to upload the addendum. Applicants should follow their local competitive rules and procedures for distributing RFPs addendums and updates.

Add an RFP Updates Not Permitted At This Time

This FCC Form 470 is currently being edited by another user. Please come back and make your edits at a later time.

- USAC will be overriding applicant portal entity information sometime in the very near future. When this occurs, any changes made during PIA will override the current data in EPC. If you have made any updates to your applicant entity portal, these will be lost. USAC has advised that notification will occur before the Entity Override and that USAC will conduct a reach out effort to applicants who have made changes.
- At this time, it is unclear whether the FY2016 site and entity data will be maintained by USAC for invoicing and audit purposes. For any applicant with site moves, additions and mergers, it is a best practice to maintain a list of those changes, outside of the EPC portal. It is also best to document the date of any site changes.
- It is unclear if the Form 471 funding request portal will still require applicants to adjust funding requests to meet the C2 budget allotment for a site location. Many applicants have struggled with USAC's requirement that they remove eligible line items, adjust units, adjust quantities and/or change the price of items simply to reduce the funding request to the C2 budget allotment. Not only does this make the Form 471 process more difficult, but it also complicates invoicing and auditing.
- If using a multi-year service agreement that included contract extensions, the current EPC system does not allow applicants to update the existing contract information. You can adjust the contract end date as you prepare the funding request, but you should continue to reference the original EPC assigned contract number. If you create a new contract in order to include the extension documentation, the SLD may view this as a new contract and not as a contract that was reviewed in a prior year.

<https://www.fundsforlearning.com/news/2016/12/epc-known-issues-and-other-tips/>

April 19, 2017



USAC Told to Fix Flaws, Focus on Service

FCC Chairman Pai has expressed concern over the current administration of the E-rate program. In a letter to Chris Henderson, CEO of the Universal Service Administrative Company (USAC), Pai outlined deficiencies in USAC's management and declared that the "current state of affairs is unacceptable."

In his letter, the Chairman reinforced the importance of E-rate funding while highlighting "serious flaws in USAC's administration of the E-Rate program – flaws that relate to the process by which schools and libraries apply for E-Rate funding and that are in fact preventing many schools and libraries from getting that funding." Pai specifically pointed to the online E-Rate Productivity Center (EPC) which has presented a [barrage of challenges](#) since its inception and likely has contributed to a [decline](#) in E-rate applicants. Chairman Pai also addressed the cost of EPC. The original cost was estimated at \$19 million but the final cost is projected to be over \$60 million.

Chairman Pai issued the following directives:

- USAC must focus on effective administration of the E-Rate
- USAC must be fully transparent with and accountable to the Commission
- USAC must identify options to assist applicants even in the event of technology system failures

A response from USAC with its plan to address these issues is due on May 18, 2017.

The FCC Chairman's letter can be found [here](#) in its entirety.

<https://www.fundsforlearning.com/news/2017/04/usac-told-to-fix-flaws-focus-on-service/>

by Peter Kaplan

April 21, 2017



Throwing Good Money After Bad

Let's step back and reassess the necessity of having an E-rate portal. This week, FCC Chairman Pai sent a [letter](#) to Chris Henderson, CEO of USAC, to outline his many concerns about USAC's E-rate Productivity Center, as well as USAC's alleged lack of transparency with applicants, service providers and even the FCC who oversees the program. According to Chairman Pai, the original cost estimate of EPC was \$19 million and now nearly \$30 million has been spent on it.

We are all familiar with EPC's structural flaws and the serious technical issues that continue to [plague](#) the system, causing schools and libraries considerable challenges in submitting their applications in a compliant and timely manner. Chairman Pai stated that he has concerns the overall cost to create a functioning E-rate portal will balloon to \$60 million, triple the original cost estimate. This is just mind numbing and unacceptable. \$19 million dollars was too much to pay for a broken system, let alone \$30 million, or even \$60 million.

As FCC Chairman Pai noted, all workable FY 2016 Form 471s were supposed to have gone out by September 1, 2016; but many of the funding letters have been significantly delayed, all because of issues tied to EPC.

Interestingly, in the midst of all of this frustration in FY2016 and FY2017, the SLD managed to disburse \$2.54 billion for FY 2015. This is the most the E-rate program has ever provided to applicants and it is a success story. While not without some challenges, the commitments and disbursements from FY 2015 were done far more effectively... and without the EPC!

After the FY 2017 filing window closes on May 11, 2017, it is time for USAC and the FCC to have a serious conversation about the E-rate portal. To start with, let's go back to the electronic filing system that was used pre-EPC. And then maybe let's consider establishing an [e-filing system](#) like the one Funds For Learning proposed in 2014.

Whatever we do, let's move away from EPC. The E-rate community cannot afford any longer to throw good money after bad. The cost, in dollars, time, and lost opportunities, is too high.

<https://www.fundsforlearning.com/news/2017/04/throwing-good-money-after-bad/>

April 28, 2017



The Elephant in the Room

We have received quite a few responses to last week's [Throwing Good Money After Bad](#) article. Below are a few clarifications and comments in response to this feedback.

1. EPC is extremely difficult to use, counterintuitive, and buggy. E-rate applicants deserve much, much better. This is just a fact.
2. EPC is a symptom of a bigger problem. In many ways, EPC is just a reflection of the complex web of E-rate rules, regulations, and policies that exist today. If it is so difficult to program software to follow the rules, is it any surprise that applicants are overwhelmed and [dropping out](#)?
3. Who is to blame for EPC? It is certainly not just USAC's fault. The FCC was very much involved in EPC's initial implementation and the FCC has given us many of the administrative complexities that are bogging the system down. At another level, we all share some responsibility for this mess. I wish that I had done more to stop this from unfolding the way it has. I think others feel the same way.

What is next? In the short term, we need an interim fix in place in time for FY2018. The next filing window needs to be better than this one. After that, we need to get started addressing the real elephant in the room. How can the E-rate program be better regulated and administered to more effectively serve our schools and libraries?

<https://www.fundsforlearning.com/news/2017/04/the-elephant-in-the-room/>

October 3, 2017



USAC Announces EPC Changes

On September 30, 2017 the SLD sent out a special news brief highlighting the fact that they have updated the EPC User-Interface. They announced that the changes to the user interface include changes to colors, fonts, shapes, and menu locations. The SLD also has released a new short video describing the changes to applicants.

The SLD EPC special news brief can be viewed [here](#).
The SLD EPC Video can be viewed [here](#).

<https://www.fundsforlearning.com/news/2017/10/usac-announces-epc-changes/>

May 3, 2018



FCC Addresses Bidding Rules Concerns

In August 2017, USAC provided new [guidance](#) to applicants and service providers tied to the competitive bidding process for certain Category One services. The guidance was confusing, and many stakeholders voiced their concerns regarding potential negative impact when USAC starts denying applicants who acted in good faith but may have not followed the letter of the new guidance tied to drop down menu on the Form 470 for "Internet Access and Transport Bundled and Transport Only-NO ISP Service" drop down menus. The FCC is now directing USAC to not deny these applications where the Form 470 was posted based on the needs of the district, but "... may have been inconsistent with USAC's guidance on which services to select from the FCC Form 470 drop-down menu within EPC online portal..."

Funds For Learning filed [comments](#) on March 18, 2018, encouraging the FCC to direct USAC not to deny thousands of potential applications because of USAC confusing guidance. Funds For Learning noted that:

- There were 13,551 applicants who submitted funding year 2018 FCC Form 470's for internet and data services as of March 18, 2018;
- As of March 18, 2018, 7,535 applicants have submitted funding requests referencing a FY 2018 Form 470;
- At least 12,249 service agreements and contracts for data and Internet have been awarded;
- \$254 million already have been requested for Internet services tied to FY 2018 Form 470s and many more were being finalized before the close of the FY 2018 filing window

The FCC letter to USAC outlining the Form 470 drop down guidance can be viewed [here](#).

<https://www.fundsforlearning.com/news/2018/05/fcc-addresses-bidding-rules-concerns/>

by **Peter Kaplan**

May 7, 2019



698 Applicants At-Risk Due to Form Design

On May 6, 2019, Funds For Learning submitted comments to the FCC detailing where applicants incorrectly selected "Internet only - No Transport" as the Category One service on their Form 470 in FY 2019. From the beginning of the E-rate program, applicants have been required to notify potential vendors of their intent to purchase goods and services. For most of the program's history, applicants could describe their needs using their own terms and descriptions. However, since the reform of the program, the FCC has required applicants to describe their technology needs using pre-defined "drop-down" menus - and then penalizing applicants who do not pick the correct menu item as defined by the FCC. Based on a Funds For Learning analysis, the E-rate dollars associated with these applicants in FY 2019 is \$23.7 million and could negatively impact 698 applicants.

The Funds For Learning FY 2019 Form 470 Drop-Down Comments can be viewed [here](#).

<https://www.fundsforlearning.com/news/2019/05/698-applicants-at-risk-due-to-form-design/>

October 1, 2019



FCC Seeks Comment On Bidding Form

On October 1, 2019, the Federal Communications Commission's Wireline Competition Bureau (WCB) and the Office of the Managing Director issued a Public Notice seeking comment on USAC's "drop-down menu options for the FCC Form 470." Indicating that the comments received will be used to develop menu options for Funding Year 2021 and beyond, the FCC hopes to "minimize the potential for applicant confusion, address concerns about the current FCC Form 470 drop-down menu options, and, to the extent practicable, to reduce administrative burdens on applicants and service providers."

In the Public Notice, the FCC not only seeks comment on the menu options themselves, but also the criteria which should be used to develop those options. Proposed criteria include:

- Intuitive and Easy-to-Understand
- Technology Neutral and Adaptable
- Facilitate Compliance with the Rules
- Searchable

The Public Notice also includes for appendices outlining potential drop-down options for FY2021 and beyond, as well as Form 470 preparation flowcharts.

Comments are due on October 31, 2019, with reply comments by November 15. The Public Notice may be downloaded [here](#).

<https://www.fundsforlearning.com/news/2019/10/fcc-seeks-comment-on-bidding-form/>

October 2, 2019



FCC Eases FY2019 Bidding Requirements

On October 1, 2019, the FCC Wireline Competition Bureau sent a letter to USAC CEO Radha Sekar explaining "how USAC should treat E-rate applications for which the applicant mistakenly selected a drop-down menu option on its FCC Form 470 that did not fully reflect the services for which it intended to seek bids." The letter was sent in conjunction with a [Public Notice](#) seeking public comment on how the Form 470 drop-down options may be improved for FY2021 and forward.

Citing feedback provided by [Funds For Learning](#) and the [State E-rate Coordinators Association \(SECA\)](#), the FCC noted that some applicants may have been confused by the Form 470 drop-down options, choosing "Internet Access: ISP Service Only (No Transport Circuit Included)" when it actually intended to procure Internet service which includes a circuit to deliver the bandwidth to its premise. Therefore, the FCC stated:

"We direct USC not to deny any remaining pending applications or issue a commitment adjustment for any application solely because the applicant selected the 'Internet Access: ISP Service Only (No Transport Circuit Included)' drop-down menu option and subsequently selected on its FCC Form 471 a service that delivers Internet access to its premises. For those applications, USAC should not find a competitive bidding violation so long as the applicant has otherwise complied with all of the Commission's competitive bidding rules."

The FCC's letter may be accessed [here](#).

<https://www.fundsforlearning.com/news/2019/10/fcc-eases-fy2019-bidding-requirements/>

November 18, 2019



Groups Suggest More 470 Changes

The reply comment period for the FCC's [Public Notice](#) regarding FCC Form 470 "drop-down menu options" closed on November 15, 2019, with numerous reply comments received by the Commission. Most reply comments were generally supportive of the State E-rate Coordinators Association's initial comments, with some additional debate about the framework for determining drop-down options as well as the possibility of adding site and address information on the Form.

The reply comments may be viewed at the following links:

- Funds For Learning
- American Library Association
- Aruba, a Hewlett Packard Enterprise company
- AT&T Services, Inc.
- CenturyLink
- Claire O'Flaherty
- CSM Consulting, Inc.
- Education Networks of America, Inc.
- EducationSuperHighway
- John Peters
- Kellogg & Sovereign Consulting
- NCTA – The Internet & Television Association
- NTCA – The Rural Broadband Association
- Oregon Department of Education
- State E-rate Coordinators' Alliance
- Wisconsin Department of Public Instruction

<https://www.fundsforlearning.com/news/2019/11/groups-suggest-more-470-changes/>

June 8, 2020



FCC Defers Form 470 Changes Until 2022

On June 8, 2020, the Federal Communications Commission released a Public Notice announcing that changes to the Form 470 drop-down menu choices will be deferred until Funding Year 2022. Per the Public Notice:

Given the ongoing disruptions caused by the COVID-19 pandemic, we think it prudent to defer making changes to the FCC Form 470 drop-down menu options until funding year 2022 to allow schools and libraries to continue to focus their time and resources on responding to the COVID-19 pandemic without the added burden of having to familiarize themselves with a modified form.

In deferring changes to the Form 470, the FCC also directed USAC to continue using its [2019 guidance](#) regarding 470s for Internet access:

...for funding year 2020, we direct USAC not to deny any application or issue a commitment adjustment for any application solely because the applicant selected the "Internet Access: ISP Service Only (No Transport Circuit Included)" drop-down menu option and subsequently selected on its FCC Form 471 a service that delivers Internet access to its premises. For those applications, USAC should not find a competitive bidding violation so long as the applicant has otherwise complied with all of the Commission's competitive bidding rules.

The Commission had solicited feedback from E-rate stakeholders regarding the "drop-down" options on the Form 470 in [October 2019](#), with a number of organizations suggesting changes in their [comments](#) and [reply comments](#). The Public Notice may be accessed [here](#), and the FCC's letter to USAC CEO Radha Sekar [here](#)

<https://www.fundsforlearning.com/news/2020/06/fcc-defers-form-470-changes-until-2022/>

Appendix B:

Applicant Comments Regarding EPC

Below are applicant comments regarding the EPC portal. These were submitted in the 2021 survey of E-rate applicants¹⁸.

No.	Comment
1	EPC application website is very clumsy and not user friendly
2	EPC can be a very cumbersome tool and is really not intuitive. For people that only use it once or twice a year, it is very difficult to navigate.
3	EPC could be designed better so it's easier to navigate. USAC could try to reduce forms and paperwork. Also PIA review could be a little less headache.
4	EPC has gotten easier to use but it still has some odd limitations which make it difficult when your situation doesn't fit perfectly.
5	EPC is horrible. It takes way too much time to find some of the forms that I need. Security appliances need to be E-rate eligible, as well as content filtering (since it is required, it would help offset some of the cost to local districts.) The E-rate program is a great program, and helps out our district tremendously. It would be great if we could use funds to provide access to households with limited access, but it would be even better if we had broadband capabilities to every household in the country, so we aren't in a situation like third-world countries. There is no excuse for it not to be available to every home that has access to electricity.
6	EPC is not easy to use for finding PIA Review inquiries and responding to them. That could be made easier.
7	EPC is not intuitive. I had to call a consultant and she was kind enough to guide me through the process.
8	EPC is not user friendly at all.
9	EPC is not user friendly. The process takes way too long. It should not be that difficult to receive our refunds. It takes months.
10	EPC is so difficult to use that when I call for help, I receive the wrong answers. Even their own staff can't figure it out. It's designed by and for tech geeks, not the public. Every step of the way, I have to look up definitions and figure out jargon.
11	EPC is terrible to use. It is not intuitive at all. The whole process in general is clumsy and unforgiving.
12	EPC is the bane of my erate experience. There is nothing intuitive nor efficient about the interface. I spend more time hunting for the place to start a form and then navigating the interview process of the form than I do on most of the other aspects of the program. It's sad to admit, the paper forms were more efficient.
13	EPC is too difficult to enter multiple products. It must be simplified.
14	EPC is very hard to work with. Complicated and repetitive. Not user friendly. Wi-Fi though important doesn't help programs that already have Wi-Fi connectivity and encourages very expensive management options which deplete E-Rate funds. Return to phones (which is what pays for E-Rate) is recommended. VOIP might work but not the same as land for rural/remote districts
15	EPC makes the application processes much easier. We appreciate the benefits of the E-rate program for our public library patrons' use of the Internet.

¹⁸ See <https://ecfsapi.fcc.gov/file/11031633917330/2021-11-03-E-rateTrendsReport-ExParte.pdf>

16	EPC needs to be easier to use. Eligible Services list can be confusing.
17	EPC NEEDS TO BE FASTER DURING CRUNCH TIMES. FCC IS TAKING TOO LONG FOR SIMPLE APPEALS (OVER 8 MOS. FOR ERROR BY USAC)
18	EPC needs to be made user friendly, especially when trying to find something that isn't one of the home screen menu choices, such as entity updates.
19	EPC needs to be more streamlined. Difficult to figure out how to get from one section to another.
20	EPC has been VERY challenging. I have done e-rate for all but 2 years of the program and it is by far the most challenging aspect I have to deal with. The Modernization Order DRASTICALLY reduced the amount of funding my high-poverty district is eligible for.
21	Epc is extremely difficult for many small libraires to use because usually only one person on staff, and we have to do every report, help patrons...everything. So ERATE is not our only job to focus on. It would be very helpful if we could have someone do it for us at ERATE
22	EPC system is extremely difficult to navigate and language is too technical for non-IT users.
23	EPC remains frustrating to use and results in wildly different amounts of detail being submitted when looking across different districts. Additionally, USAC continues to struggle with enforcing rules uniformly, conducting reviews that are appropriate or accurate and even at times struggles to respond while holding applicants to short deadlines.
24	erate process and the Web portal are not intuitive and clunky
25	(1) The length of time USAC takes to process an appeal is unacceptable. Six months after the applicant's final submission, with no further USAC questions, and still there is no USAC decision. USAC management is aware of the situation, and STILL no movement on the appeal. (2) EPC applicant RELATED ENTITIES should be SEARCHABLE. As it is, one has to tab through page after page of entities when updating entity data, this is not currently a user friendly system.
26	1) Filing deadlines should be the same every year 2) EPC portal performance should be improved during filing deadlines. 3) Smart Net maintenance should be covered as equipment cannot be upgraded to the latest software releases without it. 4) EPC portal navigation could be improved.
27	Any task that I only do once a year is somewhat a challenge. Filing e-Rate forms are in this category. But the more continuity from year to year helps me catch up and be ready. The problem is when there are major changes, like the first year of the "new" Portal; that was a little tough. Thank you for providing the great customer support you have
28	BEAR forms need to be included on the EPC.
29	1. The outsourcing of the program (customer service, PIA, invoice review, etc.) to a private company is a major problem. These folks have no long term stake in the program success. Give us some good old government employees! 2. Customer service tries to be helpful but you can't rely on anything they tell you. First tier support especially lacks in depth understanding of the program. If you want to "kind of rely" on help you have to submit a written request in EPC. That may or may not be more reliable. 3. There is massive inconsistency at USAC and their contracted reviewers about the eligibility of basic maintenance of internal connection services. 4. Services can be approved through the FCDL stage, including documentation sent to PIA, and then DENIED reimbursement when a Form 472 is submitted. THIS IS NOT RIGHT!

30	1. We utilized Category 2 funding a couple years ago to upgrade Internet cabling and WiFi equipment in our library. We won't need to do that again for awhile. The funding was critical to getting this project completed. 2. As for the USAC goal of maximizing the cost effectiveness for supported purchases. USAC is not achieving this goal. The bid process makes this process complicated. The bid process is already inherent in the process we use for selecting a vendor to provide services. We already select service providers who provide the least cost for the best product value. The bid process is a good idea, but we are already doing it. You make this process more complicated than it needs to be. 3. Final comment. The process has improved and become more user friendly. The online EPC system is a great tool and continues to add services that make this easier to access. I like the EPC system. Thank you.
31	471 window should be eliminated. 471's should be accepted as long as there are funds available. (just like was intended when the program started) Consortia need to be encouraged, not penalized. 1) Consortia discounts are a mess. 2) Separate login for EPC by consortia lead (that also files for their own services) just shows how broken EPC really is. 3) Consortia applications get reviewed last, they should be first. Self provisioned fiber MUST remain eligible. In some cases the threat that an applicant will build their own network is the only thing that might cause incumbent to actually provide high speed service. Redundant connections should be made eligible. Schools use lots of cloud services and require internet service in order to function.
32	As a small, rural community, we have a large percentage of households that do not have access to any type of internet, much less high speed. Students and job seekers depend on our internet and we depend on E-rate funding to provide that. While E-rate is an amazing funding source, I would like to see the portal and forms be made easier to understand and filled out. More user-friendly instructions would be extremely helpful.
33	Auto fill in EPC is a great efficiency enhancement on forms. My only frustrations with EPC are: 1. finding the starting point for what I need to do—navigation on tipping right? Bottom of landing page? 2. Lack of link to main portal page from anywhere in EPC (specifically when finish a form) Eligible services list—I miss the golden age when we could fund servers and phones. I understand that it was politically expedient to open C1 to all schools, but the change has made it harder to complete equipment upgrades for an urban school with high free/ reduced student numbers.
34	CIPA compliant filtering is required for the Erate program, yet is not funded. Filtering should be funded. Advanced network security should be funded. EPC could be much easier to use, though it is certainly an improvement from the paper days. Notices and items with deadlines should be front and center when a user logs in to EPC. A user should not have to navigate through multiple menus to see if there is an inquiry that requires attention.
35	Communication and training are necessary for the new erate program and changes. Continuing to improve the ease of EPC use is very helpful. Key for terms in the EPC would help. It has to be easy enough to use so we don't have to hire someone to do it.
36	communication with staff that review funding requests is TERRIBLE. We have made several attempts to respond to an inquiry for clarification by email or phone to the staff member assigned to it and seldom ever receive a response. If we receive one it is usually a few weeks later. I have NEVER received a call back when calling in and leaving a voicemail. We have an assigned state rep and she is excellent, but also limited by communication issues from EPC/USAC.

37	Current EPC and E-Rate filing process is extremely cumbersome and time consuming for smaller entities with limited personnel who do not necessarily have the funding to hire E-Rate consultation services. The EPC site is also not easy to navigate making it difficult to locate certain things when working to accomodate things like inquiry responses and the like.
38	During FY2021 process, I contacted the USAC/EPC help line. When asked if the operator would walk me through a particular task - I was told no, "that's what the consultants get paid for." When I indicated that we are a small division without a consultant - I was told, "If I tell you how to do [the task], you'll never hire a consultant."
39	Easier and more intuitive navigation moving about the EPC portal and between documents.
40	EPC and the BEAR process are still cumbersome to traverse. Please consider taking the time to ask users how they can make things simpler. Where is the question about content filtering being added to ERATE? Its a REQUIREMENT for erate yet the services and hardware are not eligible. That doesn't make sense. The government should be working with internet services providers to increase the connectivity to rural areas. They should NOT be doing this through the schools. Schools already have enough to do and don't need another thing thrown on them because the financial piece is sorted out already through ERATE. Get the ISPs to develop their networks further out to new subdivisions, to country roads, and new areas so we can connect the entire nation. Hotspots from Schools are not the solution. Homes need internet connectivity capability first and foremost (make it a utility!), then subsidize the cost for those that are on the NSLP free/reduced lunch program so they can still get internet at home. Please consider this.
41	EPC has been a life changer in terms of speeding up the application process and storing key documents for future audits and multi-year applications.
42	EPC has made everything easier -- thank you for investing in that system!
43	EPC is becoming more user friendly, but could use a little more tweaking. Finding forms is still abit cumbersome. Opening multiple forms simultaneously (ie - 470 and 471) could be streamlined more.
44	EPC is getting easier but still needs work.
45	EPC is great but kudos to the support we get every time we need assistance. These people are on top of the situation, they try hard to understand and they do their best to find a solution! I am always thankful for them!
46	EPC responses to questions/concerns/issues could be quicker.
47	EPC time out is too short, especially for consultants. Better timing by USAC of PQA's, BMIC preliminary reviews, etc., so that they are not due within the application window would greatly help consultants and applicants.
48	EPC works well once you are in but the multi-factor authentication does not always work and can be ver frustrating
49	Fix EPC. Navigation is poor. The search feature is useless. Menu items are not always indicative of the content.
50	For an infrequent user EPC is not intuitive. Some of the information that is available by the main menu structure is irrelevant to most users. (looking up nationwide info - who needs that). Menu structure and the ability to find often used items needs a drastic overhaul for the infrequent user.
51	Every application is questioned multiple times by EPC, very frustrating and difficult to work with

52	Feels like a lottery and we gamble spending entirely too much time to apply and approved for funding only to miss project windows over the summer. I visit some schools (usually larger ones) who somehow purchase very expensive products and have the resources to find every loophole for more funding. I would hope schools would be more responsible in spending. Simplify it and just send funding to schools with a base amount and add money on student enrollment and FRPL. Allow a school to let the fund build for 4-5 years for projects. It would be a reliable, consistent useful fund. We had to replace our network 100% at our cost as the funding window did not line up with us working to roll out a one2one program. The EPC portal locked me out for a couple weeks and the reviewer did not respond to emails. At this point I'm not sure if we have funding for projects we need done before August.
53	For competitive bidding, it would be better if you could reach out and solicit your own bids in addition to waiting for bids from the 470 posting on the epc portal. In rural areas, there are fewer if any responses to a 470 posting. I feel if we were allowed to request bids from a provider of our choosing combined with what is received from the 470 listing that we could save the district money as well as the e-rate program.
54	Funding still takes too long and EPC is still not user friendly especially for larger districts.
55	Generally speaking, I think the E-Rate program has been a huge benefit for the 15 school districts I represent and is very much appreciated. But as a person who has been doing E-Rate applications every year except year 1, I have to say the level of difficulty has increased to a level where most schools have difficulty being able to navigate the application process. It's even a challenge for me at times! The time for a new user to learn how to navigate the EPC dashboard, figure out what is eligible and what is not, upload contracts, complete applications correctly, and respond to USAC inquiries must be incredibly time-consuming. It's not a good fit for small school districts. I am disappointed that the process has become so cumbersome that the average person has real difficulty completing it. The thing I have the biggest issue with are the inquiries/reviews for Category 2 equipment. It sometimes feels like USAC is looking for ways to disqualify or reduce funding for Category 2 requests. With one recent review, I had to invest almost two days of work over a switch they thought was too expensive. It required me to share the bidding & scoring process, the RFP, the bids, all correspondence with vendors, a district network map, the number of rooms on campuses, the number of teachers/staff, justification for the switch, etc. And I'm waiting for the response and expect additional requests for information from USAC. In terms of suggestions, I would hope that the FCC would approve funding for off-campus Internet services (LTE) especially for rural areas to help bridge the gap with digital equity. Our district is providing LTE devices for all of our students, but I don't know how long they will be able to afford the LTE services for them. In addition, funding for security seems like a no-brainer in this day and age. Thank you for the opportunity to share a few things and know that even though I have some criticisms of the E-Rate process, I'm thankful for the opportunity to help schools receive funding that is available.
56	Get rid of it and fund the schools directly. The money is the only reason I continue to use it. Timelines are terrible and funding is extremely slow. Once you are funded EPC looks for ways to take it back. We have yet in the 5 years I've been doing it to ever have it go smoothly. Too many people putting hurdles in the way and trying to control how you use the money when we as Tech Directors know best. Personally I hate the program and wish it didn't exist. Money is the only reason why I deal with it. Classic case of when government gets involved they screw it up. But the part that keeps it alive is the money which schools desperately need. Fix the issues and it could be a great program.

57	Getting notifications of responses to inquiries has been an issue. Often times a message is replied to and I have missed a deadline because I do not actively sit on the portal checking for responses. This has caused me to petition to reopen cases. I have also had issues with multiple people auditing my account. It seems that one person was on it, and things were approved, only to have another reviewer not approve the same thing.
58	Good job on the portal. Having done this for over a decade the last few years have been so much smoother. Have also noticed a quicker turnaround too and that is appreciated.
59	Here are a few suggestions for USAC to improve the overall E-rate experience. I suggest including the CIPA certifications on the Form 471 funding application. This would eliminate the need for the Form 486, and help streamline the application and reimbursement process. I would also suggest for USAC to provide clearer guidance regarding Firewall and Firewall service eligibility rules and requirements. Finally, I suggest a push for more consistency during the PIA review process. In some instances, PIA reviewers are extremely helpful and responsive. Others offer no explanation other than the inquiries generated in EPC. Thank you to FFL for valuing the input of E-rate constituents, and for providing the opportunity to submit program feedback.
60	I am a "seasoned" public library director and have never found the application process to be intuitive or easy. The EPC portal is VERY confusing and needs a major overhaul. When you have individuals who become "E-Rate Consultants" and libraries pay good money in the form of giving up a portion of their E-Rate discount, that proves the application process is overly complicated and time consuming. I'm applying again this year as I'm at a new library. At my previous library, we opted to forego applying for E-rate funding because it was not worth it. The hours I was paid to spend working on the forms equated to almost as much money as the E-rate discount would be for the library! Our library system used to host free E-rate workshops in computer labs where a consultant would lead a group through the process for each of the forms--470, 486, etc. This was very helpful but the workshops are no longer offered. If USAC could offer virtual workshops of this nature, I believe many would take advantage and benefit.
61	I am new to E-rate this year and I find the interface of the portal very hard to navigate. It is hard to find information easily. Also the feedback from USAC is slow from my experience. As a user I feel in the dark as it can take several weeks before any decision is made and it normally does not come to you, but you need to pursue it. I feel firewall services should be a Category 1 funded service. I also believe cell phones should be eligible for reimbursements.
62	I believe that making EPC more easy to navigate with a tool bar would make the E-Rate process easier.* Not having a confusion in Category 2 regarding Basic Maintenance and Software and Licenses. * When USAC messes up and denies a service, not having to appeal, USAC should be able to go back and recognize that a mistake made on their end.
63	I feel that the EPC is difficult to navigate, especially in years that a Form 470 is required.
64	I find EPC confusing and difficult to use.
65	Have had issues trying to get responses to questions especially after submitting invoices. Have tried both calling and submitting request through EPC. Most of the time when calling, they can't provide enough information and I don't get feedback after the call in a timely manner. Shouldn't take so long to resolve issues...meaning months.

66	<p>Having to change passwords every 2 months in the EPC Center is unnecessary. Even 6 months since we have two-step authentication now. Having used the EPC Centers for several years now, it's okay but for a newcomer it would be a learning curve. Not much online help when you're right in the EPC. It's difficult to find where the PIA questions are and how to reply to them - certainly the first time you have to respond. It took a call to CSB to figure it out for me. The length of time it takes USAC to complete PIA reviews and get back to the applicants is often quite inexplicable, and also inefficient, not respecting the applicants' time, planning, and energy. Sometimes an application is not even funded or denied during the funding year! This is remarkably inefficient, leaving the applicant in the position of having to apply for the same thing again in the next year's window. Truly a waste of time and disrespect for the applicants. I know one case where a bunch of schools and libraries submitted a large application for a high-speed network, received a few PIA questions, replied, and was still kept hanging throughout that year - and the next one!! No feedback. Application wasn't funded or denied, and so much effort had to go into applying yet again. That shouldn't happen. Get the PIA reviews done in a timely manner and either reject or accept applications efficiently. Another case of a BEAR form in review - all supporting documents were sent in, but still no response 6 months later and no reimbursement as it's hung up in the review process. This again is really inexplicable, leaving the applicant to wonder if the paperwork got lost or set aside, if the reviewer left USAC. It is still a problem that the CSB will give different answers to the same question based on the knowledge or conscientiousness of the staffer. It's a major concern how USAC is ever going to efficiently handle the \$7.1 billion+ of the ECF, since they struggle now to get funding of the regular E-rate program out to the applicants, with often long delays. Now we will probably witness a burgeoning bureaucracy and new staff to eat up a large part of the funding, with lots of untrained and disengaged people who are not deeply committed to fulfill the goals of the Erate and ECF programs. We will probably see the usual government inefficiency and waste so common among gov't agencies. Loss of telephone service continues to negatively impact the budgets of many schools and libraries in remote, low-income areas. It would be great if VOIP would be encouraged or some funding for telephone service restored. Given these times of cyber attacks and piracy, with school and library records vulnerable and people's privacy threatened, USAC should encourage and fund efforts, software and equipment that enables strong network security.</p>
67	<p>I am very disappointed in the review and appeal process, especially at the FCC. My organization went through the review process and followed the recommendations of the PIA reviewer, but was denied indicating we did not follow the competitive bidding process. I filed an appeal and USAC said they could not approve this and I would need to file an FCC appeal. It has been 3 years plus since this has happened with no indication of status or way to follow up on it. This was a large sum of money that was hanging in limbo and now we are past our funding cycle and these funds will be lost if the appeal does not pass. Very unhappy with this aspect and no communication and lost funds because of this extreme delay. Otherwise, I do believe USAC is making great progress. I believe the EPC was released way to soon. The changes being made have been great and the application process has been improving slowing. Additionally, I think it is great to see the move to district budgets vs school budgets as this will definitely eliminate tracking and other needless paperwork as well as enable schools to make decisions to better utilize the funds as an organization. Additionally, I would advocate for increased uses for category two funds to include needed aspects such as content filter and network management to help us get tools to better protect our students and provide better connectivity.</p>

68	I cannot stress enough that Category 2 funding be put back at the district level. We had a brand new school receive more funding than a much older school that badly needed to be upgraded. Districts know their needs better than USAC. This model should never have been implemented. It also makes tracking Category 2 funding and expenditures a nightmare, especially since the Category 2 Budget Lookup Tool is useless due to lacking 2015 data. The document retention requirements are too stringent and an administrative burden. While it makes sense to keep records, it should not be necessary to retain paper at the granular level required by the E-Rate Program. Timely turnaround for funding commitments continues to be an issue. Applicants are basically left in limbo for an extended period on whether or not they will receive funding, making it difficult to plan and schedule work, and the only information EPC has to offer is that the application has been "Certified." This also applies to PIA review. I never receive confirmation that requested information/documentation has been received.
69	I do feel that the process has become *better* than it was years ago, and certainly approvals have come much faster over the last 10 years. I do think, however, that EPC still needs some work on overall site navigation in an effort to become more user friendly.
70	I find applying for e-rate and using EPC difficult. I am not sure why it is so complicated. I have access to a consultant who has helped me with several steps during the process. (I have applied three times). My library patrons benefit greatly from my efforts but I don't even know if I could apply successfully without the help of the consultants. The librarian in this position for many years before retirement did not apply for E-rate, perhaps because of the difficulty.
71	I find the portal to be a nightmare. Things are not organized well and it is unclear sometimes where to click. Due dates are also not obvious. Why wouldn't these be posted all over the portal???? You only get a message AFTER the due date has passed NOT leading up to or even the day before!
72	I genuinely appreciate how user-friendly the entire program is. From working with our representative, USAC, and FCC. Client services are always helpful and kind. The portal are easy to work through, and the process of the application, notice, and reimbursement is very simple. This past year, it was much easier for me to understand the process and work through it. I don't have any other comments or suggestions at this time for additional services.
73	I hate having to change our password almost every time I need to access EPC. It's time consuming and frustrating. I also wish it was easier to file forms 470 and 471. Knowing how to word certain requests is difficult.
74	I have used EPC for the past 4 years with eventually great success. It took a year to understand the process better and with the help of support, now I have an easier time applying for funds from USAC. Support personnel are a great addition to the process. They offer a needed assistance when applying for a piece of equipment or service which I had not done or it had been a while since I had done it. I know the EPC site is a continued work in process as design and flexibility change. You have always tried to make it user friendly. Thank you
75	I have found it is somewhat time consuming and ridiculous that our password has to be changed every single time I Log-In I believe this is the Biggest problem. I can understand changing it yearly, but DAILY/MINUTES, NO! Or if I Log-Out and come back to EPC say 3 minutes or more, No! This Is IRRITATING!! medically Do Not Need the Irritation.

76	I have marked low of the use of the portal because I believe it is very confusing. One has to jump back and forth adding items in order to complete forms. This money is for libraries to use to help lower costs in order to provide access to our customers and should not require a dozen hoops to fill out. If we need three switches or a firewall that cost \$1500 for instance that is what is needed regardless of make, model, where we get it, or if it goes under connections, network, wiring, or maintenance. If an item cost over \$30,000 per our procurement code yes it should require a bid. A \$300 UPS should not. I will admit it has improved over the 20 plus years it has been in existence and we could not do what we do without it, but it still needs to be more streamlined where everything can be done in one spot. One instance is that you have to go to one area and enter all the items you wish to purchase one at a time, and then you have to take these items and attach them to another form. If we did not have our state library Erate person on hand I am not sure I would ever figure out how to do it.
77	I love the EPC portal and feel USAC has done a very good job in putting it together. Utilizing the Category 2 funding our District has been able to upgrade our network, both wired and wireless, to a robust and secure system. As a rural District, our local funding levels are limited and we count on the support of E-Rate funding in a major way. Without them we would not be able to achieve the high level of success in building a modern secure network. Adding the capabilities of VOIP as an eligible service would be the final piece of the puzzle, as our communication costs have increased tremendously over the last 10 years.
78	I strongly agree that Telephone service should become available for eRate Funding once again. All schools need telephones for communication within the school, parents and outside sources. Also, the EPC portal was somewhat easier to use this year because I have used it since it was established, but for new users it is difficult and tricky. If you mark a wrong box it could cost you the entire application of funding. I just think it needs to be simplified, there is always room for improvement to anything. Thanks!
79	I think the E-Rate program is a great option to help schools with funding. I think the EPC website is awful and one of the most user unfriendly sites I've ever had to use.
80	I think the forms in EPC are very confusing. The wording is not clear, and to me it is getting more and more complicated to file a basic request. When I have called to make sure I am completing it correctly, the person I talk to always has to ask someone else. If customer service cannot always answer my question as to what service/equipment without consulting someone else, how in the world is a person requesting to know if they are submitting for the right thing? It is just getting too complicated for the average person to submit the forms.
81	I used the how to videos on EPC extensively this year. They are short and easy to follow. As a first time filer, I relied on them to get my work done. Thank you for posting those!
82	I was happy when USAC upgraded to the EPC portal, but I do find that it is not as user friendly as I would like.
83	I wish there was a way to make the EPC portal more user friendly. I have used it since the switch to the portal and it still frustrates me. I have no idea what this library would do without the E-rate program! It allows me to offer high speed internet to all my patrons who otherwise might not have this access. This and my staff, who is always willing to help people navigate the internet, is extremely important to our community. It helps us fulfill our mission of helping to serve the underserved. Thank you so much!

84	I would be very helpful to have one assigned person to help each school with the process from beginning to end. Response time should be faster. Separate local training and/or webinars One on one training EPC portal should be more user friendly E-rate program is a great program and serves its purpose of helping schools and libraries
85	I would like the opportunity to give specific recommendations to USAC about navigability and user-friendly changes they NEED to make in EPC. I wish they would ask us for those types of suggestions.
86	I'm grateful for the opportunity to apply for erate funds to support our network needs for instruction. I do find the EPC portal frustrating to navigate.
87	In general we're very happy with the ERate service, we're a low income area but we're able to provide robust high speed internet and WiFi at a manageable cost. I do find the USAC portal to be frustrating at times. I also think some of the PIA inquiries we get are redundant and/or overly pendantic, or unecessary as the answers are all in the documentation already submitted. And while I appreciate the need for PIA reviews and agree that the program needs to be protected against misuse - such reviews do slow down the approval process and can set a project back for months, often for a very minor inquiry. We've also had things approved in PIA and recived an FCDL, only to have the same questions be raised during reimbursement. I think funding should be per district, rather than per school, w=ith some oversight, but more flexibility on cost sharing than in the past... seems to be moving that way which is good. A redundant connection would be good. Community WiFi provisions would be great. I'd also like to be able to use Erate for VoIP equipment because we could put phone stuff on the same switches as our network. I'd also like to be able to use Category 2 ERate for our Central Office and bus garage, and maybe even at our ball fields. Some of this may be possible now, but all of those school properties are used in support of students and educational goals.
88	Interacting within EPC during a PIA review can be very frustrating. Without the support of Julie, EPC would be extremely hard to navigate.
89	Is there someway to improve the RAL process? Compare to the rest of the EPC processes it needs to be simplified and process needs to be improved.
90	It is extremely confusing navigating EPC. The layout of the main screens is completely illogical. It does not follow the standard navigation processes of modern websites. Having the Landing Page hidden under reports instead of being accessible as the home page for a user doesn't make any sense. I hardly ever use EPC, except for certifying applications. Instead I completely rely on FFL's ERM portal. In this age of cybersecurity attacks, network security is an integral part of any network and funding for network security appliances is imperative. Without firewalls and other advanced security technologies, networks would be attacked and overrun in minutes/hours. It is essential that the FCC consider network security equipment as critical to the requirements for a functional network as routers, switches and WAPs.
91	It would be nice if the EPC portal could be used to submit 472 forms, using two systems adds unnecessary difficulty.
92	It would be nice if the EPC portal website was much easier to navigate and see which tasks are pending. I have to contact someone from your organization every time I need to do anything in EPC because it is quite confusing.
93	It is great to have, but without technical support, I couldn't navigate the USAC portal by myself -

94	It is important to understand that the phone systems within schools is business critical for a school. Parents do not have cell phones of faculty and school administrators. Phone systems and phone network services should be eligible once again. In emergencies, people will not use the cell phones as the towers become busied out. Secondly, please allow EPC users to be able to add and remove columns on the home screen entity list. Currently I cannot see the eligible NSLP student count unless I drill into the individual entity. A loss of time. Lastly, please open the list of documents at the bottom of the screen for more application lines. Currently when I surpass 4,471 apps, I have to use an arrow to go to the next page. It would be easier to see on a longer listing. Thank you!
95	it would be nice to have training in the fall as we only use the portal once a year
96	I've been doing E-Rate applications since the 2nd year they were available. It has gotten increasingly complex. Over the years, it feels like the FCC has taken more and more away from the E-Rate program that schools need. I'm happy that finally there was an increase in the Category 2 budgets. This will help immensely in providing funding for ALL schools. I work with many rural schools with 8 to 250 students. This budget increase will make a huge difference in them being able to upgrade their networks. In terms of the application process, the EPC isn't difficult for me to use, but it wouldn't be easy or intuitive for a new user. It has gotten increasingly complex to the point that most schools (small) don't have personnel who can navigate the EPC and application process. This needs to change. Tutorials on each step of the application process should be made available. I do appreciate the customer support people who generally are able to answer my questions. That is helpful in the application process. In terms of eligible services, digital equity needs to finally take place so that students and teachers can access resources at home to meet their educational needs. Overall, the schools that I work with are very thankful (and dependent) on the E-Rate program. I hope to see increased growth and the re-establishment of funding for services (Ex. telecommunications) that have been eliminated over the years. Thanks for allowing me to share my perspective.
97	Make the bidding process easier by having the bids in the portal to access and respond.
98	Make the network core equipment such as firewall, core router, modulating electronics, and content filtering Category One eligible. Simplify the forms because if nothing else changes the forms need to be simplified and made less confusing. Get rid of the Form 486 and add CIPA Certification to 471. Get the rest of the forms such as the Form 472 into EPC. As bad as EPC is, applicants need one portal. Lessen some of the restrictions on what can be done with the services. Schools and Libraries could benefit from partnerships with other local municipalities by allowing ISP traffic to fail over to one another in the case of an outage, or by piggybacking off of portions of each other's fiber to connect locations at a lower cost. Schools and libraries could not have robust networks without the E-rate program, as it is cost prohibitive. The E-rate program opens up the world to students and patrons by allowing them to access the internet in a learning capacity. The limitations of the program and the difficulty of the program however, are holding them back from truly thriving.
99	Make the USAC portal and process more user friendly. I have worked with various vendors and portals over a 20 year career in IT and this is by far the most complex and least user friendly of all the platforms.
100	Many rural libraries have no IT person and networking is above the skill levels of the director. We shouldn't be expected to know everything we need. It is like speaking a foreign language to me. VOIP needs to be funded. EPC is hard to use because it is complicated and I only use it once a year. If it weren't for the state library's help, I couldn't do it.

101	Many times the PIA reviewers do not understand what they are requesting nor are they able to answer questions pertaining to inquiries. EPC is a bit difficult to navigate.
102	My biggest complaint is that the application processes and the EPC portal continue to be very confusing. We hire a consultant to help with this process to ensure we do not lose funding if we submit or apply for something incorrectly. It's not a user friendly discount program and it's not a user friendly portal/online process.
103	Need to improve the customer service for EPC and USAC. It will change everything at this moment customer service is very very bad.
104	Networking is important to this library but as a library director I do not have the specialized skills and knowledge needed to manage a network. I need help the most with this issue. This library is a small, rural library and cannot afford to hire a full-time computer technician to be on staff. Also, because I only submit the e-rate forms once a year, it is difficult for me to master the EPC portal. If it were not for the state library's e-rate coordinator, I couldn't manage all of the drop-down menus. Thank you for your support.
105	No other comments other than the website for EPC is so confusing. It would be nice if it wasn't so hard to navigate through.
106	None. I have mixed feelings about EPC; I like the fact that it has reduced the hard copies but it still is hard to navigate.
107	One of the goals with the implementation of EPC was to make the application process simple. Unfortunately, it is more complicated than ever. As with most government sponsored programs, there are too many forms, confusing deadlines, and a lack of interest in things that we actually need. There was a time when my district did not qualify for C2 funding. Because we didn't want to get left behind, we found a way to fund our own self provisioned fiber WAN to connect our campuses. It is my hope that if we ever need to update/upgrade that WAN, funds will be available to us. Additionally, school districts are required to implement security/safety measures to ensure that students are protected from objectionable material, yet no funding is made available for content filters and similar tools. It would be most helpful to schools if USAC would include such items on the eligibility list. While delivery of high speed internet to classrooms is the ultimate goal of USAC. It is also important that those unfunded mandates such as online safety also receive due attention.
108	Our contacts are always nice and courteous, but I have problems navigating EPC. It would be great if it was more user friendly.
109	Overall the system has gotten much better. PIA review tends to still take too long, but decisions have appeared to have gone faster this year. Navigation within EPC still I feel could be much more natural and flow better. Additionally, If there were a better way to structure eRate funding where the process was less involved overall it would be better and picked up by more. As it stands now, a single person in a school district is busy with eRate for two-three months a year! Many times that district can't afford that person to be so busy on just one thing.
110	Overall very happy with E-rate. Portal has taken some learning, but the funding help has been critical for us. It has allowed us to expand our technology envelope for all students, making their learning experience much better.

111	Overall we are happy with the E-rate program and it has been a great source for my Philadelphia School who can use all the support they can get. The only thing that has been a struggle this past year is getting customer service on the phone. I like to talk to someone in person not through text on the EPC portal. I also get frustrated when I have already proven things through inquiries for Cat 1 and then get the same exact inquiries for Cat 2 for the same School. Can't they see what was already uploaded? Or at least be trained to look in other inquiries that may have been completed for that School and funding year before asking the same question again. That is very annoying and I would reach out to the person who sent the inquiry but they just apologize and tell me I have to answer it anyways because it's already out there. They can't retract inquiries? This is something I would just train for them to look into before they send inquiries, it could save a lot of time and make the process even quicker if they already have the evidence they need.
112	Please do not put the burden of providing internet to families on schools. K12 IT staff already have a lot on their plate and don't need the additional responsibility of having to maintain and troubleshoot home internet as well. Moreover, this stop-gap is only useful for when families have school aged children at home. Students that go to a 2-year tech school or are trying to earn a 4-year degree need internet as well. Not to mention the parents of those students need internet at home to make better informed decisions. The money that would be dumped into schools for hotspots and other substandard wireless systems for internet would be wasted. These dollars would be better suited to encourage ISP's to install wired internet in areas that do not have them at this time, (or only have a limited number of options to create competition). Additional dollars could be used to reduce the cost of internet for families, like E-rate, using the NSLP eligibility. Wired internet is more reliable than wireless internet and it would permanently give an option for families to maintain internet connections over time. Internet should be a utility. It should be wired to every household in the nation, available to many of the major ISP's for service and the program should not be managed/maintained through the schools and libraries. EPC is still complicated. Look to reduce its complexity and wording. Please also consider changing rules so school districts should be able to pre-order using SPI. The BEAR process is restrictive for some districts to find funding initially with a pay back later on, and isn't really needed as an option. If every district got the discount upfront, they would be happy.
113	Please get the Bear form/process moved over the EPC. Also, things need to run smoother and quicker on the side decisions being made so we as applicants/consultants can start our processes sooner and not be running up against a crunch when the deadline comes.
114	Please improve the portal. It is difficult to navigate for the average person. Not everyone has someone who can assist with applying and dealing with issues that arise.
115	PIA is simpler and less stressful using EPC with email notifications. Over all EPC has made the E-rate process so much easier.
116	PIA reviewers are out of touch or don't have access to FRN history. I've been asked to supply contracts for multi-year services after year 1, when the contracts already exist in EPC, and when the previous FRNs were approved. PIA reviewers often ask for copies of the same evidence, multiple times, and with multiple agents. This review process is often frustrating and inefficient.
117	Please consider the following: - IP Phone Eligibility - Bids have to be uploaded to the EPC (not mailed, faxed, emailed, etc.) - Allow bus WiFi - Funding for filtering devices and services (I understand that it is a federal law to have it, but it should be eligible for E-rate)

118	Please make the EPC easier to use and navigate. Thanks!
119	Primary concerns are with the EPC as documented earlier.
120	School bus internet would be nice, but it is way down my list of priorities. With the current infrastructure in this area, it is not possible at this time. Since filtering is required for every school and library, it is beyond my understanding why it is not an eligible service. It is a part of a network, that implemented poorly, is detrimental to the whole network, yet it is not eligible for support. This is one of the highest priority issues that needs to change. Phones would be nice to have back on the eligible list, but I would not trade one of the current services to get this service. EPC needs to be updated to be user friendly. It is a poor interface that could contribute to errors and does not inform users well of the tasks that need to be completed. Take a look at Facebook, or any other social platform, to see how a modern, interactive website should operate. Important notifications and incomplete forms should be front and center when a user logs into EPC.
121	See comments in EPC improvement section. Eliminate C2 budgets by location!! Collect total cost and # of unit figures and then have USAC do the simple math of determining cost/unit. It is way too cumbersome the way costs on applications need to be entered on a per unit basis!!
122	Service Providers are in need of training in the areas of creating and supplying applicants with contracts that are in compliance with the E-Rate program. We oftentimes experience very lengthy wait times from when an award is made until a contract is fully executed only because of service provider slowness. This year we could have been done filing applications 2 weeks prior to the window closing, but couldn't complete until 3 hours prior to the window closing because a Service Provider waited until then to provide us with a fully executed contract. This has been our biggest issue with the E-Rate program in the last several years. EPC itself functions well overall.
123	Simplify Category 2 budgets. Make review questions clearer, not more complex. Improve the speed of the portal in high demand situations.
124	The 2 factor auth for EPC is absurd, hard to get help, forms can be confusing, many vendors increased cost when quoting for erate
125	-The checkboxes do not print on the forms when saving to PDF during and after the certifying process. I would like to have the checkboxes actually appear in the file. I have to use screen shots in order to prove what boxes were checked -It would be nice to have better reporting and the use of downloading data for reports. Better filtering to get mote granular data. -It would be nice if the Service Providers had to upload bids to the portal. A one-stop shop and everything in one place.
126	The contractors such as Solix/Maximus/Vangent need both more and better training. Otherwise, it will cause more applicants To not file. They make too many mistakes. The EPC has got to be upgraded or completely replaced as was promised by the FCC insiders about 18 months ago.
127	The cumbersomeness of the EPC system has yet to be addressed. Where is your "Home" page? It is under Reports. How do you add a contract for a 471? I'm still looking. The system looks like it was designed for a different purpose and was retrofitted to serve as a document system.
128	The BEAR form process is extremely outdated compared to the EPC website. It would be nice to see that streamlined.
129	Taught that all audits and PIA would have communications in the EPC system. This has not been the case but it should be.

130	Thank you for your support for our students, our staff, and their needs. Your efforts and successes are very much appreciated! As an eRate program administrator for 14 years our district has the following needs: funds that support equitable and comprehensive telecommunications services (phones rather than bus wifi, low cost professionally managed transport networks rather than managing our own WAN), build EPC as a workflow solution complete with timelines, notifications, progress indicators, etc rather than a flat database of tools, and add the ability to complete BEAR and SPI work inside of the system. Finally, add the ability to add all of the information that PIA reviewers need to the system as we go through our process (procurement announcements, bid tabulations, quotes, etc.) and have the system approve or disapprove of equipment/services before the procurement process (like a preapproved list from each company) - this would lower the administrative burden on the PIA reviewer. Related ideas for workflow before the fact rather than after would help us work more effectively and prevent fraud as well. Again, thanks for all you do!
131	The availability to input information into the EPC portal and having the ability to update information can be problematic. Beyond that, the FCC number is another process yet the two are interlinked. Here in NM, we have state erate coordinators for both schools and libraries. It would be helpful if they could update information on those EPC portal for librarians who don't understand the EPC system, erate and or technology. It seems our librarians are going in constantly to make changes, correct information, contact USAC help desk to complete the task, add consultants etc. etc. WHEW! Joy Poole 505-660-2845
132	The complicated online portals are driving potential E-rate applicants away even more than the phasedown of voice service discounts. The smaller/rural schools and libraries in most need of discounts can't afford to pay someone to handle their filing (and frankly, many alleged professionals fail to understand the needs of library applicants), and those applicants shouldn't have to devote so much time each year to relearning the portal navigation. Also, passing responsibilities from one staff member to another takes too long and requires too many steps. If EPC cannot be updated to allow users to change their emails, then a new portal should be designed from the ground up. The frustration and wasted time created by the EPC portal is shameful.
133	The current EPC is very cumbersome. Finding, documents like contracts, are difficult to find and the location of their storage on the site make no science.
134	The current simplification of the ESL is an improvement over former practices. EPC is not all bad, primarily because I have gotten used to its quirks. But, it is not user-friendly. I have to resort to googling where to find things in EPC. I still bristle at the restrictions of not being able to edit contracts once they are created and not being able to edit organizations (entities; student counts, etc.) once the 471 filing window opens.
135	The ease of using the EPC portal has improved over the last several years.
136	The email process to setup a new Account Administrator is very time consuming for staff who are too busy to deal with timely emails and expiring passwords. They assign other staff to handle these but changes to administrators causes this issue again. It was easier when we only had to place a piece of paper in front of them for a signature than having them manage access to the portal.
137	The EPC and application process is still cumbersome. There's a lot of information coming out of USAC -- relatively little of it is of consequence. Streamline your communications. Make sure that any tax money paid in from this area makes it back to this area. Respect that local decision makers understand local needs. One size does not fit all nationally.

138	The EPC is slowly getting easier to use but it is still not intuitive. The closure of the administrative window makes it really difficult to get correct counts and organizational relationships correct when needed. There is little guidance for consultants on their web page in terms of how to get your consulting number or get an organization assigned to you. Thanks for asking! And for your webinars and other support.
139	The EPC is unwieldy and difficult to use.
140	The EPC portal and USAC site are very difficult to navigate and are not intuitive to use. I had to make many calls to multiple contacts in order to find forms or inquiries, to complete. I am a complete novice to this system but from the perspective of an IT Professional, this could use a serious overhaul, it is inefficient, difficult to use, and so confusing it looks intentional.
141	The EPC portal has many limitations and can be frustrating. The response time for invoicing and cases has increased majorly over the past year. Not having visibility into the invoicing side especially with the delays has been frustrating.
142	The EPC portal is really difficult to navigate for those of us that only do it to meet the application requirements and management process.
143	The EPC portal is still somewhat difficult to use. Would like to see servers added back to the eligibility list.
144	The EPC program is still difficult to navigate. More work needs to be done to fix this. A internet filter is required for erate internet, but an internet filter is not eligible - how backwards is that? Many sites have virtual servers running on powerful hardware. This hardware should be completely eligible and we shouldn't have to justify "portions" of it for erate eligibility. PIA review should allow for a phone call. Sometimes things are much easier to explain in a non-text way. After COVID - hotspots should become eligible along with any supporting software for offsite use. Also, firewall service renewals (and hardware if not able to be included) ought to be eligible under category 1!
145	The EPC site could stand to be a little easier to maneuver. The eligibility services list needs to be expanded to provide cybersecurity funding and at-home internet access for students.
146	The EPC site is NOT intuitive. In fact, it is a nasty, cranky beast. The signed contract must be added before you start the form 471. Easy would be having a drop box as you complete the form 471. Every time I use this portal, I have Melissa from the Department of Libraries help me. I have been doing this for 7 years. The screens are not user friendly. The sequencing for what needs to be done next on the screens is horrid. You should always read down, but sometimes they have things off the the side. There should also be a list of approved providers for each state, so we can double check who is eligible.
147	The EPC site is not user friendly or intuitive. the user experience is not friendly. In addition the PIA process is ridiculous, takes too much time and the reviewers ask the same questions over and over rather than explain why the previous response is not sufficient. It is a dreaded process. Similarly the bid process is absurd, its like comparing apples to bananas because every vendors quote format is so different, I have not idea if I get a good deal, I typically select based on familiarity with the company over price.
148	The EPC web portal is needlessly complicated. Very difficult to put information in and get information out. This is not an intuitive set up at all.

149	The ERATE process is very difficult. I am a public librarian and filling out the ERATE forms is very difficult. The wording is not easy to understand. I think it would help if the designers would think about the most rural and remote librarians as their clients. And then think about how we have little to no help with the forms or understanding the process of the forms. The videos on EPC are very helpful and I appreciate them. I feel strongly the entire process is more difficult than it needs to be. Thank you
150	The erate program and USAC portal remain frustratingly difficult for non-specialists to use and understand.
151	The Erate program is absolutely vital to our district success and deeply appreciated. As a rural district, there is concern about broadband connectivity to the homes that I think the FCC can address with the adjustments to current mechanisms. Regarding EPC, in the past the system would email me when a notice for PIA info request was in system, but this year it did not. I just happened to check EPC and found an almost expired requests. I don't know if this change was deliberate, a side-effect of another change or I missed the information about the change. There might be others that relied on the emails to check EPC.
152	The E-rate program is convoluted. It could be simplified as a shopping cart for goods needed, we live in the age of Amazon after all. Say I pick "Aruba 6100x switch or equivalent", now every business that has opted in for a "switch sales group" within 200 miles of my location gets notified that my order exists. They can then silently bid against one another on the back end. Then I, the buyer, log in and make a final decision using a digital spreadsheet the EPC system poops out. I shouldn't have to siphon through 80 different email strings to buy basic hardware. As a money-saving project this is wasting my time, my employers time, the taxpayers time. Time is money. CDW's online store is a very basic but poorly executed example of this, you can order goods and it lists different suppliers, so the end-user gets to choose the best "bid" for the item they are buying. More complicated install jobs can follow the current structure. More Tutorials should be made. Too much stuff in the EPC was scattered around willy nilly. It is a vast improvement from last year, but there is still work to be done. I remember wasting half a day just trying to find where to make contracts. There was no mention of them on the current tutorials, all of a sudden it just said, "now pick one of your contracts". Please take a lump of taxpayer money and make this so easy a blind child could do it. There is no reason for paid consultants to exist in 2021 with how far technology has advanced. They should be free government supplied tech support. If TurboTax can do it, then so can Erate.
153	The E-Rate program is wonderful, and the EPC portal is relatively easy to use. I do, however, wish that networks with more than one school site (I have 15 that I manage) could have them all managed under one account rather than 15 separate e-mails and EPC accounts.
154	The knowledge base portal used to be easy to find documents we needed to fill out forms. Now it is impossible and what I do find, seems to be very limited in information. And when we call for assistance, they answer quick (that is great). But, they always seem to be in a hurry to get me off the phone. Usually they can't answer my questions very well.
155	the portal is miserable to use
156	The forms needs to be easier to fill out. I have to get help each year from Okla. Dept. of Library because the forms are so confusing. Also I don't like the e-rate system to throw my pass word out for the year. It should be the same the whole process. It makes it harder to get a new password every time you need to get into the portal.

157	The goals of the program are critical and my interactions with staff have always been excellent. However, navigating the program is a huge headache. Some information is in EPC, some in the BEAR reimbursement site, some is emailed, and some is postal mailed. For example, as far as I know, I can't go online and see a history of reimbursements paid; I have to piece that together via many pieces of mailed paperwork. The acronyms and form names are endlessly confusing and would benefit from simplified natural language. Instead of calling it form 472 or BEAR form, just call it a reimbursement form. The opaqueness and steep learning curve of the process causes errors and prevents organizations from fully participating. The fact that there is a whole consultant industry needed makes this clear.
158	The money allocated through E-Rate did not originate with USAC. It's taxpayers' money and should be returned to local taxpayers. Each year you make it more difficult to do this. Our support is a little over \$500 each year. It's a pathetic amount of reimbursement. The EPC has not made the E-Rate program any easier to use.
159	The navigation in EPC/USAC is clunky. To return to a former screen you have to start all over. A way to move back a screen would be a nice feature. The reviewers questions are often confusing, and when we only have 15 days to respond and then it takes a month and a half for the review to look at the response it feels like we're spinning our wheels.
160	The online EPC portal is clunky and not intuitive. It needs an overhaul.
161	The PIA part of this program is a gotcha program. Why I say this is the same data uploaded into EPC is always requested again. I believe all data should be requested with the submission of the 471. They have access to it all. The SLD should request all contracts, bid responses, evaluations, etc. I understand the PIA and Audits and they should have them. The SLD just makes it difficult for the applicant.
162	The portal is difficult to navigate through, but the response from customer support is always exceptional.
163	The portal is exceptionally difficult to navigate and the human resources respond in a non-personable, robotic manner to which it is no different than the difficult to follow forms and processes. It takes weeks for a response and the response is just a repeat of the form which is what the question was about. This happens every year and the training is only good for people that do e-rate all year long. As a school admin that also is the only person to do the e-rate filing, it is overwhelming and unsupportive resulting in less connection for our students.
164	The portal is not designed well and hard to navigate. Voice services should be included because they are not going away and have been a burden to schools since they were phased out. USAC customer service response time has increased significantly.
165	The portal is painful, I dread using it every year. The interface is not user-friendly at all.
166	The portal is very difficult to navigate as an organization that cannot afford to hire outside help to complete the application process. The directions are not clear, links are complicated and difficult to return to. This site was not made for a small organization with a limited budget for tech staffing.
167	The program is vital to us and our patrons. Content filtering and security services need to be eligible for E-Rate funding! There should be an allotment of bandwidth that can be used for voice without penalty. The portal should ask for and assist with document retention and all phases of the process. Attempt to remove the fear from the system.

168	The removal of Telephone/VOIP for the category One list - worst decision ever! This has had a long term effect on our district. Please put it back on the list. The portals are not easy to navigate. We are a small district , small department and have no time- I have to hire a vendor to perform the E-Rate tasks. Keep it simple and provide better online trainings.
169	The system is better than it was. The timing is awkward - we don't get notified until the funding year is well underway so we run the risk of not getting the funding and having to cover the costs ourselves. Thankfully this hasn't happened yet (we are a small poor school district so we are lucky.) I understand that they had some abuses and that now they are being cautious, but the system is rather cumbersome. EPC did make it easier, but it's still not user friendly.
170	The USAC review program continuously delays approval timeline and causes unnecessary work for customers. We are beginning the fifth year of our current WAN contract (which has been approved four consecutive years by USAC), and I have received the same annual reviews with this year incurring three reviews requesting the same information already loaded in the EPC - contract copies, bid copies, etc. I applied a month prior to the initial deadline, and I am seven days away from the new fund year and do not have an approval notification as of yet. Also, the limitations with bidding in which new vendors requiring a new network infrastructure cost more than maintaining equipment and vendors already in place. The bidding requirements while in theory a good practice, are more costly with the frequent 470 and vendor and equipment changes. A flat amount of funding of dollars per FTE with factors for free and reduced lunch would lessen the work and expense for all.
171	Their customer support is very lacking by USAC/EPC employees. This year it seems they have very "junior/rookie" employees who ask repetitive, useless questions that we have not experienced in the past.
172	They need to get the Form 472 into the EPC portal. They need to better education their Helpdesk staff and PIA Reviewers. The reviewers for invoicing need better communication skills and be more responsive to the applicant and service providers. USAC needs to be more proactive in helping applicants.
173	This is an amazing program. It has helped our little school very much through the years. EPC helps answer so many questions and the people are very easy to work with.
174	When you only get into epc a couple of times a year it is difficult to navigate.
175	USAC's EPC Support line is EXCELLENT!!!!
176	This is very hard to fill out by myself. I always have to get help from a consultant from the OKDL to fill out the forms and I don't like every time I go back in to the portal I have to put a new pass word in. You should be able to use the same pass word for that year. Very frustrating. This should be made a lot easier to use.
177	Way too much time is spent on picayune audits with many questions, demands reiterated year after year. USAC auditors should access the information in EPC that applicants are mandated to upload/update.
178	This is my first year with E-Rate. I have found the EPC system to be fairly easy to use, especially compared to what I heard about the past system. Any additional training materials that can be provided on what actually qualifies for e-Rate would be much appreciated. The most difficult part for me is knowing what qualifies, how to classify requests, and other requirements of the program. Once you know that the filing part seems easy.

179	<p>The redesigned USAC.org website is much less helpful than the old one - very difficult to find necessary reference links. EPC is not very intuitive, making it necessary to call the Client Service Bureau often to verify the procedures or to understand what they really want. For someone who files for quite a few libraries, they send emails that never identify which library the email pertains to that needs a response. How difficult would it be to at least name the library or give a identifying number? I also am very disappointed that USAC/FCC really isn't facilitating getting the rural areas equipped with high speed Internet with a minimum of 100 Mg. Groups in our state have submitted applications for 3 years and never got funded - USAC just so busy desperately trying to find reasons to deny funding - or not completing the reviews in a timely manner. I cannot understand or condone that USAC does not complete the reviews no later than a few months into the new funding year. In some cases USAC never even gets the review completed by the end of the funding year! What good does it do to even apply? And then having to submit a new Form 470 or Form 471, not even knowing what's going to happen to the current application. This is so inefficient and wouldn't be tolerated in any business environment. Yet schools and libraries have to put up with this terrible waste of their time. We are expected to meet every deadline, but there's little accountability to get prompt funding commitments made. Furthermore, having to keep paperwork for 10 years, is a massive burden. There is major turnover in many organizations often just within a year or two, so keeping track of 5-10 year old paperwork is an onerous burden. Probably 98%+ of all applicants are doing their level best to be honest and accurate in their implementation of Internet and technology in their schools and libraries. It would be nice if the USAC's attitude wasn't punitive. Changing passwords in EPC every 2 mos. is a big burden when one handles E-rate for several or even many entities. It is regrettable that this program is so onerous that most entities need to hire consultants. Having a simple process would encourage more schools and libraries to participate. The eligible services list also is rather obfuscating, using a lot of technical language that the average lay person may not understand, again necessitating consulting services. And yet USAC seems to be pretty negative about involving service providers too closely in trying to figure out the best technology to implement in a region. One concern that probably is increasingly serious is that some vendors are opting out of the E-rate program because the paperwork is too onerous, and they don't want to allocate staff time and energy to pursue the entities' requests. It usually works best to contact vendors on our own inviting them to bid, and yet it is not always easy to find where those vendors are. Many times our applications have only received one bid and in some cases none, until we called around to let vendors know what we need. The problem is that some are not even signed on with USAC and they don't want to either. Having a heavy-handed bureaucratic oversight may seem an act of diligence on the part of USAC but it also stifles the marketplace. Of course, it remains a problem also that USAC turnover is large, so many reviewers are also learning as they go and it's common to get differing answers or even wrong answers at times. I will say that the USAC employees are polite and easy to talk to, and try to help. The bottom line is that libraries need the E-rate program. They could not function without it, especially in rural, remote areas. We need to be mindful that in those areas it is so common that there is only one service provider. I hope USAC is ready for 5G and will be encouraging its implementation if deemed safe for people's health.</p>
180	<p>This program is definitely necessary for schools. Failover internet service is also necessary and we could get a better failover service if it were allowed on Erate. Things are a lot faster with the EPC portal.</p>

181	<p>UPS systems should be all encompassing and included provided they are supporting systems that support our network. E.G. - almost all sites have servers, UPS systems are used to keep them up and functioning in our environment. The EPC system still need some work. It's cumbersome to traverse. Wording is particular but not easy to follow for the average person filling it out. Power is required by all systems included/supported by the program however power and energy systems are not included to be funded. Major costs come into play with equipment being added due to the cost of electricity. Systems could be put into place to offset some of those costs and reduce the overhead to incorporate these systems. (e.g. wind / hydrogen / geothermal / hydroelectric / etc). There are ways to offset some of those costs to help school districts out. Telecommunications is absolutely key to every organization - why telecommunications would be removed is unreasonable. If it was to allow other districts to purchase wifi and networking systems that's fine, perhaps a limitation can be added to prevent those things from occurring during the same application year. But after you have a functioning system in place, years afterward could be used to offset those inherent costs. Web hosting used to be included. I'm not aware of any district out there without a web based presence. It would be great to bring that back, (prices have gone up not only because erate funds aren't there to offset costs but also, they don't have to compete within the program itself). Districts should be able to use the funds district wide but have to report individual school purchases. The reality is that not all school buildings/sites are equal so locking funds into a building that, say, was built before another building, makes no sense. I wouldn't have to spend erate dollars on wiring for that building but the needs may be different in my older building. If there was an opportunity to include pricing between districts in the filing process, it would be helpful for people to see where they are at (think education super highway). Ideally, there would be a way to add consortium pricing (multi-district purchasing). In theory, someone from USAC could advocate with a vendor on their behalf to get even better pricing) - everybody but the provider wins.</p>
182	<p>We cannot manage financially without e-rate, and are therefore grateful for the program. However the program and portal are a confusing mess, and take entirely too much staff time to complete. Answers from USAC staff are often incomplete or incorrect.</p>
183	<p>We have lost funding due to the complicated application and extremely unfriendly EPC program!</p>
184	<p>We submitted a BEAR in Aug 2020. Still waiting for reimbursement. I called USAC several times, but receive no update other than "It's still being processed." I opened a Customer Service case in the portal Still awaiting an update.</p>
185	<p>While improved, EPC continues to be difficult to navigate. USAC continues to muddle up the differences between licenses and basic maintenance, especially blended products. Funding commitments that are issued after PIA review should be reimbursed during the invoice process without having to justify eligibility of services again. It is not infrequent that an in-depth PIA review occurs, a FCDL is issued, and later a BEAR invoice for reimbursement is denied. THIS MUST STOP!</p>
186	<p>While the overall E-Rate application and implementation process has gotten better over the years, the EPC Portal is extremely cumbersome, along with the whole budgeting process.</p>